
Mid-Sussex District Plan: Housing Matters Statement

Prepared for Thakeham Homes Ltd
Representor number #20293

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1. Statement of Purpose

1.1. This document contains representations for Thakeham Homes Ltd on the Mid Sussex District Plan 2014-2031, specifically in response to document *ID3 - Housing Matters - Questions for Examination Hearings*. Thakeham Homes is the applicant for two applications at Pease Pottage, under consideration by Mid Sussex District Council:

- **Application DM/15/4711 (Outline)** - The phased development of approximately 600 dwellings (Use Class C3), (including affordable housing), 48 bed care facility (Use Class C2), Community building (Use Class D1), cafe (Use Class A3) and retail (Use Class A1), up to 1 form-entry primary school (Use Class D1), hard/soft landscaping including a noise bund/fence, infrastructure provision, creation of accesses and car parking.
- **Application DM/15/4706** - Detailed permission for first phase of 156 dwellings

1.2. The application site corresponds to the proposed allocation site DP9a in the MSDP. Thakeham Homes is also part of the *Mid Sussex Developers Forum* which has provided answers on some of the questions in ID3; this document answers others which are more directly relevant to the proposed allocation of land at Pease Pottage (MSDP policy DP9A), as highlighted below:

Question / topic	Response by
1.1 – SHMA and HEDNA	Developers Forum
2.1 – OAN and underlying calculations	Developers Forum
2.2 – OAN and market signals	Developers Forum
2.3 – OAN and jobs growth	Developers Forum
3.1 – Duty to co-operate	Developers Forum
4.1 – Unmet need	Developers Forum
4.2 – Cross-boundary calculations	Developers Forum
5.1 – Affordable housing requirements	Developers Forum
6.1 – Ability for market to deliver	Developers Forum
7.1 – Past under-delivery	Developers Forum
8.1 – Strategic Site Selection methodologies	Thakeham Homes
8.2 – Environmental ‘tipping point’	Developers Forum
8.3 – Sustainability Appraisal	Thakeham Homes
8.4 – Allocation of Pease Pottage site	Thakeham Homes
8.5 – Spatial Strategy	Developers Forum
9.1 – Housing trajectories (overall)	Thakeham Homes
9.2 – Timing of the Site Allocations plan	Developers Forum
10.1 – Liverpool methodology	Developers Forum
10.2 – 5 year deliverable sites	Developers Forum
10.3 – Underprovision	Developers Forum
10.4 – Buffer	Developers Forum
10.5 – Sedgfield methodology	Developers Forum
10.6 – Sufficiency / reliability of supply	Developers Forum

1.3. Thakeham notes that some of the questions raised in the Housing Matters sessions relate directly to Pease Pottage. Thakeham suggests at the outset that until questions relating to the Plan's housing requirement are resolved, it would be wrong to seek to examine in detail how those needs should be met. Thakeham does not understand the Inspector's questions in the Housing Matter suggestions to relate directly to the suitability of Pease Pottage as a housing site and therefore the points raised in the Inspector's questions are addressed at a strategic level. With that in mind, Thakeham's response to the questions highlighted above is as set out below.

2. Response to questions

2.1. Inspector's Question 8.1:

“Are the methodologies described in the Strategic Site Selection Paper and the SHLAA sound”

(i) Strategic Site Selection Paper (ref EP23)

2.1.1. Thakeham considers the Site Selection Paper ('SSP') methodology is sound and that it has played an appropriate role in the identification and review of sites for allocation within the MSDP. This is for several reasons.

2.1.2. Firstly the SSP has focussed on strategic-level sites (500 units or greater), which is appropriate in preparing the overarching MSDP as opposed to the Site Allocations Plan. This is consistent with NPPF, paragraph 47, which affirms that in order to significantly boost the supply of housing, Local Planning Authorities should *'identify key sites which are critical to the delivery of the housing strategy over the plan period'*. In this regard the SSP is also consistent with paragraph 157 of the NPPF (4th bullet point) which affirms that one of the crucial roles Local Plans should play is the identification of broad locations for *'strategic development'*.

2.1.3. Secondly, the SSP is directly informed by the Sustainability Appraisal process, and a series of other evidence base studies taking into account all principal constraints relevant to site selection, including environmental, technical, heritage, and other considerations. In assessing constraints, the SSP acknowledges the need to attribute greater weight to an AONB location in light of NPPF paragraphs 115-116.

2.1.4. Indeed, paragraph 1.40 of the Site Selection Paper affirms: *'In terms of the constraints assessed, impacts on the AONB hold the greatest weight due to their protection in the NPPF'*. Paragraphs 1.42-1.46 of the SSP also set out the requirement to fulfil 'Special Circumstances' in the case of allocating sites in the AONB. In doing so it takes account of the 3 principal criteria of NPPF paragraph 116 which (in turn) relate to: the need for development; alternatives; and, the effects of development.

2.1.5. Thirdly, the SSP – as is appropriate in the context of a district that cannot demonstrate a sufficient housing land supply - attaches great weight to deliverability. As noted in paragraph 1.41 of the SSP, where sites are not actively promoted or would not significantly contribute to housing need, it would not be justified to include them within the MSDP, and this is particularly the case for strategic-scale sites where barriers to development are typically greater.

2.1.6. The focus on deliverability is consistent with various provisions of the NPPF, including:

- NPPF para. 47 (2nd bullet) which deals with the need to maintain a supply of specific deliverable sites;
- NPPF para. 49, which renders policies for the supply of housing out-of-date where there is no such supply;
- NPPF para. 182 (3rd bullet) which requires plans to be deliverable if they are to be effective and sound.

2.1.7. Overall, the Strategic Site Selection Paper appropriately sets out the process of selecting strategic sites, including Pease Pottage / DP9a, for allocation in the MSDP.

(ii) Strategic Housing Land Availability Assessment (SHLAA) (Ref EP26i)

2.1.8. As set out in the Developers Forum statement, Thakeham has concerns over elements of the methodology used in the adopted SHLAA, and believes it may not be fully robust, given (for example) that MSDC is resolving to grant permission on sites considered unsuitable for development in the SHLAA.

2.1.9. However the fact that in considering certain individual planning applications, MSDC has arrived at a different outcome from the SHLAA, does not undermine the SHLAA's overarching findings in respect of strategic sites.

2.1.10. As set out in the Annexes to document MSDC1, none of the applications currently pending or approved by Mid Sussex District Council, entail greater than 130 dwellings. Equally the largest site at appeal is for 200 units. As such, notwithstanding other shortcomings of the SHLAA, it is not the case that it has overlooked deliverable strategic-scale alternatives to the Pease Pottage site.

2.1.11. Insofar as it has considered strategic-scale sites, the SHLAA has in our view taken an appropriate position view with regards to the environmental, technical, infrastructure and ownership constraints that affect how such sites could come forward.

2.2. Inspector's Question 8.3:

"To what extent is the Sustainability Appraisal preferred option (Focus development within or adjacent to Burgess Hill, East Grinstead and Haywards Heath, but encourage both larger villages and smaller villages to take growth to support the provision of additional services and meet local needs) reflected in the distribution of strategic allocations and the overall spatial strategy of the submitted plan?"

2.2.1. It is not apparent to us that the above approach actually is the SA preferred option. To be clear, in the matter of 'Principles of Distribution', the 5 options set out by the SA (on page 102) are reproduced below:

Principles of Distribution
Options:
A) Focus development within or adjacent to the three towns only (Burgess Hill, East Grinstead, Haywards Heath), maximising the use of brownfield land where possible, and restricting growth of other settlements.
B) Focus development within or adjacent to the three towns (as Option A) but allows the larger villages with good service provision to take some growth. Smaller villages would only take growth essential to meet local needs.
C) Focus development within or adjacent to the three towns (Burgess Hill, East Grinstead, Haywards Heath), but encourage both larger villages and smaller villages to take growth to support the provision of additional services and meet local needs.
D) Focus development towards areas where housing and economic need is arising, including need arising from outside Mid Sussex. This will predominantly be within or adjacent to the three towns (Burgess Hill, East Grinstead, Haywards Heath), but encourages villages to take growth to support the provision of additional services and meet local needs. It will also focus development at strategic locations that could best assist in meeting the District housing need and the unmet needs of neighbouring authorities.
E) Focus development towards a new settlement.

2.2.2. Question 8.3 therefore appears to be quoting option (C), whereas on page 105 of the SA, the Preferred Option is identified as (D).

2.2.3. For the reasons set out under the next question, Thakeham considers the selection of option (D) within the SA to have been appropriate.

2.3. Inspector's Question 8.4:

“Can the allocation of the Pease Pottage site be reconciled with the SA and SHLAA findings? How is the site expected to relate to Crawley in terms of connectivity?”

(i) Reconciliation with the SA and SHLAA findings

2.3.1. The answer to the first part of Question 8.4 is yes. Not only can the allocation of the Pease Pottage site be reconciled with the SA and SHLAA findings, but its allocation is a logical conclusion of those findings.

Sustainability Appraisal

2.3.2. Turning first to the SA, we refer to document BP5 (Sustainability Appraisal) and its Non-Technical Summary (BP6). These consider the following strategic matters in turn:

- 1: Housing – Objectively Assessed Need (OAN) and Plan Provision
- 2: Distribution of Development - Principles
- 3: Distribution of Development - Broad Locations for Strategic Development
- 4: Strategic Sites

2.3.3. Arising from point (1), the Developers Forum (of which Thakeham Homes is a member) considers MSDC's calculations of OAN to be unsound. Notwithstanding this, Thakeham agrees with the view set out at paragraph 7.28 of the SA that it is necessary for the MSDP to address unmet needs from Crawley. As is then noted in paragraph 7.30 of the SA, one of the key considerations in doing so is to avoid promoting unsustainable commuting or migration patterns. This conclusion indicates the need for allocation sites close to, and particularly to the south of, Crawley such as provided for at Pease Pottage under policy DP9a.

2.3.4. Under (2), the SA in turn gives consideration to alternative strategies for distributing growth, having regard to the roles and functions of different settlements. Of the available policy options, the SA identifies (correctly in our view) that the most sustainable approach is to focus development predominantly within or adjacent to the three main towns, and *'at strategic locations that could best assist in meeting the District housing need and the unmet needs of neighbouring authorities.'* (SA Non-Technical Summary, p.13). Again, this reinforces the case for an allocation at Pease Pottage.

2.3.5. Under point (3) the SA moves on to consider the more detailed matter of which broad locations within the overall spatial approach are most sustainable, and identifies that:

'In terms of broad locations for strategic development to meet housing need where it arises (the most sustainable principle for Distribution of Development, appraised above), the most sustainable broad locations are (a) – Around Burgess Hill, (b) – Around East Grinstead, (c) – Around Haywards Heath and (j) – South of Crawley.'

SA non-technical summary, pp.15-16

2.3.6. Under point (4), the SA then gives consideration to 17 separate 'Strategic Sites', against a range of social, environmental and economic criteria, confirming to the three 'dimensions' of sustainable development identified at paragraph 7 of the NPPF. From this assessment, the Pease Pottage site (described as Site M, Hardriding Farm), is identified as having positive sustainability characteristics:

- under Objective 1, (*providing a 'Decent and Affordable Home'*), Site M is identified as being available and achievable within the SHLAA;
- under Objective 2 (*promoting 'Access to Health'*), Site M is identified as making provision for health facilities on-site whilst also being accessible to existing facilities in Crawley;
- under Objective 3 (*providing 'Opportunities for Education'*) Site M is positively identified as including on-site facilities, as well as being able to access existing facilities in Crawley;
- under Objective 4 (*providing 'Access to Retail and Community Facilities'*), Site M is identified as being of a sufficient size to proposing community facilities with café and retail on site, whilst also being able to use existing facilities in Crawley;
- under Objective 5 (*'Cohesive, Safe, Crime Resistant Communities'*), Site M is identified less positively than alternatives at Burgess Hill, Cuckfield, East Grinstead and Haywards Heath which are deemed to relate more closely to existing communities in Mid Sussex. However, the SA has already accepted the need for the MSDP to allocate development to fulfil Crawley's unmet need, and as identified above, land to the south of Crawley has been found the most sustainable alternative in doing so. As such Thakeham does not consider the SA's assessment of Site M under Objective 5 to preclude its allocation in the MSDP;
- under Objective 6 (*Flood Risk*), Site M is identified as having no associated flood risk issues;
- under Objective 7 (*Efficient Land Use*), all alternatives are considered to be equal on the basis that greenfield land releases are necessary;
- under Objective 8 (*'Conserve and Enhance Biodiversity'*), a number of alternatives including Site M are less positively assessed due to the presence of Ancient Woodland. However the EIA to the Pease Pottage application¹ concludes that with mitigation, adverse effects on ecology can be reduced to minor adverse (at worst) on any individual receptor, with neutral or minor beneficial effects occurring on a larger number of receptors. More specifically, the EIA identifies a range of mitigation and enhancement measures which would result in minor beneficial effects on the woodland habitat at the occupational stage. These include an integrated landscape and biodiversity design, fencing, buffers areas, public information provision, and the removal of rhododendron.
- under Objective 9, to *'Protect and Enhance Countryside'*, Site M is acknowledged to be wholly within the High Weald AONB, but is assessed as having medium potential in landscape terms in terms of overall capacity, suitability and yield.
- under Objective 10 (*'Protect and Enhance Historic Environment'*), site M is identified as having no impact on designations, placing it more favourably than the majority of other alternatives.
- under Objective 11 (*'Reduce Road Congestion'*), Site M is identified as being less well served by public transport facilities, and further from essential services. However, the application at Pease Pottage has (as

¹ See: <http://194.165.12.101/AnitePublicDocs/00407852.pdf>

set out later in this Statement) secured a major new bus route between the site and Crawley which will significantly reduce reliance on the private motor vehicle. This aspect of the SA is thus unduly negative as regards Site M.

- under Objective 12 ('Reduce Waste Generation'), Objective 13 ('Maintain and Improve Water Quality'), and Objective 14 ('Increase Energy Efficiency') all sites are considered to have an effect equal to or more negative than Site M.
- under Objective 15 ('Encourage regeneration of Town and village Centres'), Site M is identified as having a positive effect on the regeneration of Pease Pottage village.
- under Objective 17 ('Ensure High and Stable Employment Levels') the majority of sites (including Site M) are considered on an equally positive basis, with only Site A being considered to have greater economic benefits due to the quantum of business floorspace proposed on site. Similarly under objective 18 ('Support Economic Growth'), Site M is identified along with several others as having the potential to 'aid the viability of existing businesses within Mid Sussex, and help secure new businesses in the area.' Thakeham does not dispute this aspect of the SA *per se*, but notes it does appear to somewhat overlook the economic geography of this sub-region, which is centred on Crawley (the heart of the 'Gatwick Diamond'). For the reasons set out on pages 10-12 of the Planning Statement Addendum to Thakeham's application (see Appendix 1), the Pease Pottage site is unique in Mid Sussex in terms of its contribution to that major driver of economic growth.
- under Objective 18 ('Encourage Tourism') all sites are identified as having a neutral effect, although this overlooks a major recreational benefit offered by Site M, in terms of access into Tilgate Forest. The Pease Pottage site will provide a significant recreational benefit in this respect with development contributing funding towards managed access to the forest, provision of Forestry Commission wardens, and management company. As such there is a greater positive effect on this sustainability criterion than indicated in the SA.

2.3.7. In summary, Thakeham considers the allocation of the Pease Pottage site is entirely justified in terms of the SA. Indeed, as we have highlighted, under some criteria the SA has been overly conservative with regards to its assessment of the Pease Pottage site. As such the inclusion of policy DP9a in the Plan is consistent with the findings of the SA.

(ii) SHLAA and consideration of the AONB location

2.3.8. Likewise, Thakeham considers that the allocation of the Pease Pottage site under policy DP9a is consistent with the successive SHLAA exercises undertaken by MSDC. As set out above, the SHLAA has identified very few deliverable opportunities on strategic scale, whether in or out of the AONB. However, the Pease Pottage site is identified² as deliverable and developable within 5 years subject to careful consideration of layout, design, and service provision, with the inclusion of appropriate mitigation.

2.3.9. The case for the site coming through the SHLAA process, in terms of the exceptional circumstances identified by NPPF paragraph 116, centres on 3 factors:

² SHLAA reference 666, under the 'commitments' part of the chapter for Slaugham Parish

- (1) the need for the development;
- (2) possible alternatives to the development; and
- (3) consideration of the impacts of the development.

2.3.10. As regards (1), the case for approving the Pease Pottage application rests on several factors:

- a severe and persistent absence of a five year housing land supply;
- the location of the development proposal based on the acknowledged unmet needs of Crawley;
- various national considerations, notably highways network enhancements to the M23, and the provision of hospice care;
- a range of economic benefits.

2.3.11. In respect of (2), as borne out by MSDC's SHLAA exercise and Strategic Site Selection Paper, there are no non-AONB sites within the District capable of delivering strategic development on the scale of Pease Pottage, within the necessary timescales to fulfill objectively-assessed housing needs and within close proximity to Crawley from where much of that need arises.

2.3.12. In respect of (3), as identified through the SA process, overall the Pease Pottage site will attract positive environmental effects to demonstrate the exceptional circumstances necessary to justify development, having regard to landscape, recreational and other impacts.

(iii) Connectivity between Pease Pottage and Crawley (and beyond)

Public Transport improvements

2.3.13. At present there is only an hourly frequency daytime service to Pease Pottage on weekdays and Saturdays, with no evening service, and only 4 buses each way on Sundays. Existing residents of the village have been lobbying for service to be improved and the main local operator, Metrobus, is keen to enhance services to Pease Pottage, but they are not commercially viable without subsidies.

2.3.14. Thakeham's application offers the opportunity to significantly improve services to Pease Pottage, with Metrobus keen to extend the Fastway 20 route which runs through Crawley and onto Gatwick (and uses modern, high quality vehicles, utilising the guided bus lanes which provide priority over other vehicles), and is to be increased to up to a 15-minute frequency, to serve both the scheme and the village, providing a significant benefit to existing residents, with half-hourly evening and Sunday services. The bus shall be provided to encapsulate the shift working on the on-site hospice.

2.3.15. Bus stops within the development would be of a high quality with raised kerbs to facilitate boarding/alighting, shelters and real time information. This is a key component of the development, and Highways England and WSCC were insistent that improved services must be secured in conjunction with the scheme.

Improved Pedestrian/Cyclist Infrastructure

2.3.16. Improved pedestrian and cycle links are proposed in conjunction with the development with new crossings proposed on Brighton Road and Horsham Road together with footway widening on the bridge over the M23, to improve the route into Crawley via Old Brighton Road North. As discussed and agreed with HE and WSCC, we are also looking to propose pedestrian deterrents (in the form of deterrent paving, guard railing and fences) to encourage pedestrians to travel along the new improved infrastructure. These improvements are shown on the attached drawings. Figures 1C/1A show how existing and proposed (Pedestrian and Cyclist) desire lines shall be accommodated and also what facilities can be accessed.

Internal Provisions

2.3.17. In addition to improved services, the new primary school will also cater not only for children living in the new development but also those residing in existing houses in the village (plus those who will live in the new scheme on the driving range site under construction), so reducing the distance they have to travel to school (at Handcross).

2.3.18. The application also includes a proposed shop which will reduce the need for residents of the development to travel for everyday convenience shopping needs and complement the existing facilities within the Moto Services.

Access and Highways

2.3.19. The scheme shall also provide a suitable access into site, which is proposed both directly from Brighton Road by means of a new 4-arm roundabout (incorporating the existing Services access) and from the Brighton Road/Horsham Road roundabout via Parish Lane, and has been agreed with HE and WSCC. These improvements will provide appropriate capacity in the area and improve highway safety for pedestrian and cyclists.

2.3.20. Full signalisation of the gyratory at the M23 J11 has been agreed with HE/WSCC and is to be implemented in conjunction with the scheme, together with widening of the circulatory carriageway on both sides of the M23. This more than mitigates the traffic impact of the development, resulting in the gyratory operating better than the existing layout with the development traffic, providing another benefit to residents of Pease Pottage, Crawley and the wider area. These improvements are shown on the attached drawings.

Summary

2.3.21. The Pease Pottage application is thoroughly justified with reference to the Council's SA criteria and SHLAA, and far from being an isolated site, is demonstrably capable of being integrated into Crawley, where much of the unmet housing need in the wider housing market area arises.

2.3.22. As a result of the existing landscape setting and the scheme's integral landscape and visual mitigation measures, the Application will not have a significant adverse effect on the landscape or visual amenity of the wider AONB. Views of the new development will be from an extremely limited area, and include only glimpses of new buildings. In general, the scheme will reinforce the wooded character of the AONB and help replace the urban fringe character provided by the car boot sale, farm complex and composting facility with a high quality residential scheme set within a landscape structure that reflects and reinforces the wider landscape character.

2.4. Inspector's Question 9.1:

“What are the housing delivery trajectories overall and a reasonable estimate from the neighbourhood plans?”

2.4.1. Thakeham comments on this in respect of the Pease Pottage site specifically.

Ability to deliver at a higher rate

2.4.2. First we note that the trajectory used by the Council (set out in Annex C to document MSDC1) is based on 50 dwellings per year, which the Council notes is its ‘general experience from one developer’. However Thakeham projects a much faster delivery rate, as set out in the table below:

	Y1	Y2	Y3	Y4	Y5	5 year total
	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	
MSDC trajectory	Permission granted	Conditions discharged, ground works commenced	50	50	50	150
Thakeham trajectory	Permission granted	Conditions discharged, ground works commenced, 50 units delivered	100	150	150	450

2.4.3. Thakeham thus **objects** to the trajectory element of the submitted plan and proposes the revised trajectory as set out above.

2.4.4. The faster and earlier delivery rate will be achievable because:

- The S.106 agreement on the Outline application is at an advanced stage and capable of being delivered immediately on committee resolution, potentially by November 2016;
- There is significant progress in delivering Phase 1 of the application, with a fully detailed application for 156 dwellings already being in the planning process;
- There will be 2 sales outlets on the Pease Pottage site, delivering at up to 75 dwellings which reflects delivery elsewhere in the sub-region;
- market conditions, relating to pent-up demand in the absence of supply, will favour rapid delivery.

2.4.5. To substantiate point (iv), we would refer to delivery rates at the nearest comparable strategic sites, at Kilnwood Vale and West of Horsham, set out in the Horsham District Council – Housing Authority Monitoring Report Mid Yearly Update May 2016³. An excerpt of this is shown below:

³https://www.horsham.gov.uk/_data/assets/pdf_file/0015/34611/CHAPTER-3-Mid-Yearly-Update.pdf

Table 4: Net Actual and Estimated Delivery of the West of Bewbush and Kilnwood Vale Strategic Developments

		2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	Total
Kilnwood	Expected				149	150	150	180	180	240	230	220	200	200	150	120	2500
Vale	Completed	0	75	76	0	0	0	0	0	0	0	0	0	0	0	0	151
West of	Expected				320	232	164	82	53	105	105	105	105	151	0	0	2008
Horsham	Completed	61	213	312	0	0	0	0	0	0	0	0	0	0	0	0	586

2.4.6. As indicated, completions at West of Horsham have been at 213 and 312 units in the past two monitoring years, with 75 / 76 units also completed at Kilnwood Vale, and Horsham DC expects rates to rise further at both sites in the immediate period.

2.4.7. In addition, delivery at the Northern Arc will, as set out by the Developers' Forum, occur at a slower rate than has hitherto been projected. This will add to the pent-up demand in the initial period.

Consideration of supply

2.4.8. It is necessary to bring the trajectory for Pease Pottage forward as proposed by Thakeham not only in order to ensure the MSDP accurately reflects early deliverability, but also to fulfil housing supply needs.

2.4.9. In Annex A to MSDC1 - *Response to Inspector*, the Council identifies the following sources of additional supply within 5 years, secured since April 2016:

- i. Neighbourhood plan sites – 515 units;
- ii. Applications approved – 70 units;
- iii. Pending applications – 654 units;
- iv. Live appeals – 932 units.

2.4.10. Based on Savills' assessment of housing land supply (July 2016, Appendix 2), based on the Sedgefield method and with a 20% buffer, MSDC's deliverable supply (of 3.65 years) equates to some 1,340 dwellings below a full 5 year supply. As such, it would be necessary for over 60% of the above new sources to come forward within 5 years, for there to be a sufficient pipeline of supply – a scenario which is highly unlikely.

2.4.11. Therefore even in the unlikely event all will come forward it is clearly important to allocate a Strategic site at Pease Pottage in order to support early delivery.

Appendix 1 – Planning Statement Addendum (July 2016)

(From Thakeham's application at Pease Pottage, ref DM/15/4711)

Planning Statement: Addendum

Land East of Brighton Road, Pease Pottage



Planning Statement Addendum

Land East of Brighton Road, Pease Pottage



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1. Introduction

Background

- 1.1. In November 2015, a planning application was made to Mid Sussex District Council (MSDC) by Thakeham Homes Ltd and Mr G W Bridges ('the Applicant') with the following description of development:

'The phased development of residential units (including affordable housing) (Use Class C3), care facility (Use Class C2), community building (Use Class D1), café (Use Class A3), retail (Use Class A1), up to 1 form entry primary school (Use Class D1), hard/soft landscaping including a noise bund/ fence, infrastructure provision, creation of accesses and car parking. Application includes demolition of 2 dwelling houses, ancillary agricultural buildings, removal of waste facility and stopping up existing vehicular access (post construction). Outline permission is sought, with matters of access only for approval'.

- 1.2. The application is registered under application number DM/15/4711, and remains under consideration by MSDC in its capacity as Local Planning Authority (LPA). In parallel a Full Planning application by the same Applicant (reference DM/15/4706) is under consideration, relating to a first fully detailed phase comprising 156 dwellings, care facility, shop, cafe, and community building.

- 1.3. The application site is identified in the emerging MSDC District Plan, under policy DP9A, encompassing approximately 600 new homes, a new primary school, and a hospice including a community cafe. The proposed wording to this policy¹ identifies that:

- the site is located within the High Weald Area of Outstanding Natural Beauty (AONB), but *'quality is particularly poor on the western side of the site adjacent to the motorway and the service station, and there would be potential for development to enhance the visual quality of this area'*;
- Crawley Borough *'has a need to provide for about 5,000 additional homes during the period until 2030 which are not capable of being built within the town'*, prompting the need to consider urban extensions;
- in locational terms, *'the site's proximity and accessibility to Crawley (there are good bus links) provides a sustainable opportunity to meet some of the town's unmet needs'*.
- given ongoing work with West Sussex County Council (WSCC) and Highways England (HE) to ensure that access can be satisfactorily gained to the site without exacerbating current traffic conditions at Junction 11 of the M23. It is thought likely at this stage that there are viable mitigation measures that could be put in place such as the improved signalisation of the roundabout.

- 1.4. It is anticipated that MSDC will formally submit the draft plan to the Secretary of State in late Summer 2016, followed by Examination in Public in Autumn 2016 and adoption early 2017.

¹ See: <http://www.midsussex.gov.uk/media/77279/dpfascheduleofmodsnov15.pdf> , page 29

Planning Statement Addendum

Land East of Brighton Road, Pease Pottage



Key consultation matters arising

- 1.5. During the consultation process on the Outline application a number of environmental and technical matters have arisen, and the Applicant has proactively engaged with consultees in order to reach mutually acceptable solutions. These have included (for example) making amendments to proposed ponds in order to avoid Gatwick Airport safeguarding concerns in relation to bird strikes; and engagement with HE and WSCC with regards to the assessment and mitigation of traffic impacts.
- 1.6. Separately from these site-specific considerations, a major matter arising has been the interpretation of the National Planning Policy Framework (NPPF), as relevant to development within AONBs. Specifically, consultees including Crawley Borough Council, Natural England and the High Weald AONB unit have referred to NPPF paragraphs 115-116, which read as follows, as a key consideration:

115. Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.

116. Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and*
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

Statement of purpose

- 1.7. The purpose of this Planning Statement Addendum is to provide a detailed and justified evaluation of the Application against paragraph 116 of the NPPF. It contains three principal sections, structured around the three bullet points of paragraph 116, which in essence relate to:
- the **need** for the development (Section 2);
 - possible **alternatives** to the development (Section 3);
 - consideration of the **impacts** of the development (section 4).
- 1.8. This Statement demonstrates that the Application is fundamentally justified under all three, being necessary to fulfil housing needs; the only deliverable means of doing so; and capable of being implemented without significant adverse effects. The Application also delivers various other benefits including open space, environmental enhancements, provision of hospice care, and education, which further demonstrate the exceptional circumstances that justify the proposal.

2. Need for the development

2.1. The first bullet point under NPPF paragraph 116 refers to assessing:

'the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy'

2.2. In response this section considers the following four matters:

- i. the need for development in terms of housing land supply;
- ii. other national considerations;
- iii. the benefit to the local economy of granting permission.

(i) Housing land supply

2.3. Mid Sussex District Council is currently unable to demonstrate a 5 year housing land supply; this is a matter that is consistently established through a number of recent appeal decisions, including:

- APP/D3830/W/15/3140867 and APP/D3830/W/15/3134454 (Barn Cottage, Ansty), 1 July 2016;
- APP/D3830/W/16/3144084 (64 & 66 Janes Lane, Burgess Hill), 23 June 2016;
- APP/D3830/W/15/3038217 and APP/D3830/W/15/3129329 (Broad Street, Cuckfield), 31 May 2016.

2.4. It has been accepted by MSDC that sufficient housing land supply cannot be demonstrated, and in Paragraph 41 to the Appeal Decision on the Cuckfield case, the Inspector states that:

The Council accepts it is unable to demonstrate a five-year supply of housing land. The Council does not have an agreed housing target that has been assessed through local plan examination, although the emerging DP identifies a housing requirement for 11,050 homes up until 2031. I also note that, since 2006, the Council has been unable to meet the previous South East Plan annual target of 855 dwellings and that a 20% buffer would also need to be applied to any future supply.

2.5. Included with this report at Appendix 1 is a detailed assessment of housing land supply in Mid Sussex identifying the extent of the shortfall based on a range of scenarios. This identifies a severe shortfall of available housing sites in Mid Sussex, resulting in an absence of five year housing land supply (5YHLS) by a considerable margin.

2.6. Both Savills and the Council are in agreement that there is a history of persistent under delivery and therefore a 20% buffer is appropriate, in line with the requirements of the NPPF. Housing delivery has not met the requirement for eight of the past 10 years. Based on a reasonable non implementation rate (of 10%) and utilising the well recognised 'Sedgefield' method, it is considered that the best case scenario for the 5YHLS of Mid Sussex is in the order of **3.65 years**. This is a best case scenario as Savills has not scrutinised the delivery expectations of Mid Sussex DC in this assessment and therefore relied upon the Council's own forecasting. However, should there be difficulty in delivering all forecasted units or the Council's assumptions challenged, the 5YLS figure would fall below 3.65 years.

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Consideration of unmet need from Crawley

- 2.7. The emerging MSDP includes a significant element of delivery towards unmet housing need at Crawley. According to the draft wording of MSDP policy DP9A (November 2015):

*'It has been established through the Crawley Local Plan examination that the borough has a need to provide for about 5,000 additional homes during the period until 2030 which are not capable of being built within the town. Crawley Borough Council is required to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area (Horsham and Mid Sussex), in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This includes continued assessment of potential urban extensions to Crawley.'*²

- 2.8. Correspondingly, Policy H1 of the adopted Crawley Borough Local Plan 2015-2030 (adopted December 2015) states:

*'There will be a remaining unmet housing need, of approximately 5,000 dwellings, arising from Crawley over the Plan period. The council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of potential urban extensions to Crawley.'*³

- 2.9. In the emerging MSDP, of the 800 dwellings required per annum, circa 150 (18.75%) of the overall target relates to Crawley's unmet need. Therefore in determining where within Mid Sussex housing should be delivered, and specifically the Pease Pottage application, it is relevant to take into account geographical proximity to Crawley.

- 2.10. The NPPF contains no specific guidance as to how or where unmet needs arising from one authority area should be planned for by others; its only reference to unmet need is under paragraph 182 noting that Local Plans should be 'positively prepared' and include unmet requirements from neighbouring authorities 'where it is reasonable to do so and consistent with achieving sustainable development'. Similarly the National Planning Practice Guidance (NPPG)⁴ refers to doing so in a way 'consistent with policies in the National Planning Policy Framework as a whole'. A key principle of the NPPF is to promote compact patterns of development⁵ and thus reduce the need to travel⁶ in the interest of reducing movements by private motor vehicle and the associated atmospheric emissions, whilst promoting sustainable modes of transport and quality of life.

- 2.11. If providing for the needs of Crawley in any location outside of Crawley, it will be necessary to ensure that it is well related to and well connected to Crawley in order to achieve sustainable patterns of movement and strike a balance between the social (need for people to have houses near to where they want to

² See: http://www.midsussex.gov.uk/media/4087/dp_fa_scheduleofmodsnov2015.pdf, page 26

³ See: <http://www.crawley.gov.uk/pw/web/PUB271853>, page 75

⁴ Ref: 12-002-20140306 <http://planningguidance.communities.gov.uk/blog/guidance/local-plans/local-plans-key-issues/>

⁵ Including paragraph 17 (penultimate bullet point) and paragraph 30,

⁶ Including NPPF paragraphs 30, 32, 34,

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live/where there home is, where they work, etc) and environmental (reducing the need to travel by encouraging sustainable modes of transport, etc).

- 2.12. Pease Pottage is well located in relation to Crawley, a principal sub-regional centre, and to Tilgate Forest which is a major recreational destination. Pease Pottage village itself also includes services including pub, convenience shop and other facilities at the service station together with bus routes to Crawley, Brighton and other parts of Mid Sussex. As such the Application site is in a location where future occupants would only need to make short car journeys and therefore one where the need to travel could be minimised and sustainable modes maximised as required by paragraph 34 of the NPPF. This is also consistent with Objective 8 and Policy DP1 of the emerging MSDP which specifically aim to ensure that people have the opportunity to live and work in their community in order to reduce commuting.
- 2.13. Of relevance is a recent appeal decision in Warwickshire. A proposal for up to 84 dwellings in Bishops Itchington was allowed at Appeal (PINS ref. APP/J3720/W/15/3133319). Within this decision, at paragraphs 21-24 the Inspector makes clear that the future occupants would only need to make short car journeys alongside the availability of access to sustainable modes. Similarly at Pease Pottage, new public transport infrastructure, as well as the site's inherent characteristics in locational terms, would further reduce the need to travel. This is a relevant interpretation of NPPF paragraph 34, and demonstrates the importance of the location of development, 'in the round'. This also corresponds with emerging MSDP strategic objectives regarding reducing the need to travel.

Summary: housing land supply

- 2.14. In summary, there is a significant housing land supply shortfall and a significant need to bring forward major proposals in sustainable locations, particularly in locations at and around Crawley, adding significant weight to the need to approve the Application as an exception to NPPF paragraph 116.
- 2.15. Section 3 of this document considers the potential for identifying strategic-scale housing sites close to Crawley, and identifies that there are no suitable alternatives other than the Pease Pottage development.

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(ii) Other national considerations

- 2.16. Amongst the various benefits that would arise from the proposed development at Pease Pottage, we consider that (beyond the delivery of housing, which as noted in the preceding section is critical) a further two are of national significance: highway improvements and provision of hospice care.

Highways

- 2.17. The planning application incorporates provision for significant highway improvement works to Junction 11 of the M23. These measures are set out in drawing W990-001 (rev N) and encompass:

- widening of the circulatory carriageway;
- widening of the Brighton Road exit from the gyratory;
- new signalling including the introduction of a signalised approach from the A264 and B2114;
- the introduction of anti-skid surfacing;
- various modifications to speed limits;
- safety improvements for non-motorised users.

- 2.18. The Application was accompanied by a comprehensive Transport Assessment undertaken within a wider Environmental Impact Assessment (EIA), which has predicted a permanent beneficial effect as a result of the improvements. In consultation on the application, Highways England has confirmed its acceptance of the proposed improvements following an extensive period of liaison over how these could be delivered. The M23 is part of the strategic national road network, and the improvements that would be delivered through the application are therefore, by definition, national in nature.

- 2.19. The proposed improvements to Junction 11 would complement the national strategy for the strategic road network, which is set out in the *National Infrastructure Delivery Plan 2016-2021* (NIDP) published by the Infrastructure and Projects Authority in March 2016⁷. At a strategic scale, this identifies that the SRN is 'vital to businesses and the successful functioning of the economy' (paragraph 3.2), and yet is an element of the nation's infrastructure that has declined over recent decades, to the detriment of connectivity and economic flows (paragraph 3.3). As such, according to paragraph 3.4:

'The government is committed to addressing these challenges by building a better network with smarter roads that use technology and modern road building techniques. In this way it can ensure the country has a road network that drives, instead of constrains, growth.'

- 2.20. Of more particular relevance to Pease Pottage is that the NIDP identifies the upgrading of the M23 at Junctions 8-10, as a key priority up to 2020-2021, in order to ensure better connectivity to Gatwick Airport. Improvements to the nearby Junction 11 at Pease Pottage are clearly complementary to that aim, and highlight that this area is a sustainable location for all types of new development including housing. The application therefore represents a unique opportunity to improve the Strategic Road Network (SRN).

⁷ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/520086/2904569_nidp_deliveryplan.pdf

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Care facility

- 2.21. In addition to the provision of market and affordable housing, this Application encompasses a 48-bed hospice care facility, with scope for subsequent future expansion, making direct provision towards identified national and local needs, based on the Crawley/ Mid Sussex catchment. This is to be carried out in partnership with St Catherine's hospice, whose existing site within Crawley is severely constrained and not capable of being effectively extended or adapted to meet statutory requirements.
- 2.22. The provision of substantial new hospice care facilities such as at Pease Pottage responds directly to a range of policy objectives and is a national consideration for a number of related reasons:
- i. Paragraph 50 of the NPPF requires local planning authorities to '*plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community*'. Specialist facilities such as hospices should be considered as integral to this aim.
 - ii. Hospices are considered an integral part of care for the elderly, as set out in the NHS's *End of Life Care Strategy* (NHS/ Department of Health, 2008)⁸;
 - iii. Provision of a large-scale purpose-built hospice facility is only possible on a strategic-scale development with a mixture of uses. In the case of the Pease Pottage application, the hospice will form part of a wider local centre including retail, cafe and community meeting rooms, around a formal village green area that will provide a central communal space for the community;
 - iv. there are no comparable proposals within Mid Sussex District that encompass such a major hospice facility as this, which are part of a deliverable development scheme within 3 years.
- 2.23. This national benefit can only be achieved through the delivery of the proposed development at Pease Pottage, contributing significantly to the case for releasing this AONB site for development.

Summary: national considerations

- 2.24. In summary, there are significant positive national considerations associated with this Application which add weight to the need for it to be granted as an exception to NPPF paragraph 116.

⁸ http://www.cpa.org.uk/cpa/End_of_Life_Care_Strategy.pdf

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(ii) Benefit to the local economy of granting permission

2.26. The Environmental Statement which accompanied this application has examined the potential socio-economic effects of the development, in light of the socio-economic conditions of the area. Principal benefits identified in this process include:

- total expenditure (construction cost) of approximately **£131 million**;
- between 659-1,205 **person-years** of construction employment;
- the equivalent of approximately **66 full-time construction jobs** over a 7-year period;
- secondary beneficial effects relating to construction, through the expenditure of the construction workforce in local businesses;
- the opportunity to **use local suppliers** during the construction period;
- creation of a **demand for employment** for residents of the site;
- creation by residents on the site of a demand **for local services and facilities** which will itself require a workforce;
- direct support of approximately **22 jobs** through the hospice, local centre, cafe and community facility;
- around 15 Full Time Equivalent (FTE) teaching and support staff for the primary school with a further 3 FTE cleaning/ catering/supervisory staff, and 6 FTE staff associated with early years;
- in the region of **£13.1 million** gross additional household spending from the development;
- the proposed improvements to the M23 through **Junction 11** capacity enhancements.

2.27. The Application is also consistent with, and indeed actively advances, a number of economic objectives for the area as set out by the *Coast to Capital Local Enterprise Partnership* (LEP) in its Strategic Economic Plan (SEP⁹). This explains the important role of housing in economic growth by stating that:

'Housing has a significant role in driving the composition of our future workforce - there is an intrinsic link between housing supply and labour market composition. Growth of affordable and entry-level housing can help replenish the local labour market, attracting and helping to retain a younger workforce. Offering a choice and mix of higher-end properties can attract and retain an enterprising, high-skilled labour force. Having the right mix of housing in the right location benefits the economy through improved labour mobility and better work incentives.' (p.148)

⁹ http://www.coast2capital.org.uk/images/Coast_to_Capital_SEP_FINAL_for_March_v14_without_Annexes.pdf

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- 2.28. Similarly the SEP recognises that where housing options are constrained, this has a detrimental effect on economic prospects in a region, stating that:

“a lack of market access for new entrants could constrain the replenishment of the labour pool, creating recruitment difficulties and skill shortages – an issue which has real implications for growth potential among businesses and the economy as a whole” (SEP, p.148)

- 2.29. The SEP goes on to further note that housing is in itself a ‘key driver for growth’, with the house building industry being ‘a significant contributor to the international flow of trade in construction materials...’, such that ‘long-term investment in house building can have beneficial effects on the supply side of the economy and can help raise growth rates’ (SEP, p.148). For such benefits to be achieved however, it is also important, for house building to be located appropriately with respect to the infrastructure and socio-economic geography of the area, avoiding long distance commuting, and promoting a higher quality of life whilst preventing unnecessary strain on infrastructure. The SEP states on p.151 that:

“Housing investment has the potential to support and influence outcomes across a number of priority themes in the Coast to Capital region– notably in relation to spatial growth, sustainable development, labour and skills supply, low carbon development and transport strategy. Failing to address the availability of the right types of housing, ownership mechanisms and cost will have a long lasting and negative effect on the Coast to Capital economy”.

- 2.30. Page 56 of the SEP describes the Gatwick Diamond, which centres on Crawley, as follows:

The Gatwick Diamond is the beating heart of the Coast to Capital economy. It has a number of important business locations and is home to 45,000 businesses, ranging from global bluechip companies to small and innovative enterprises. Generating £19.2 billion GDP (2011) the Gatwick Diamond is one of the strongest regional economies in the UK.

- 2.31. However, the SEP specifically highlights that in the Gatwick Diamond, one of the key barriers to growth is the ‘lack of housing for new and existing workers and families to rent or buy’¹⁰. As a consequence it goes on to state (p.56) that: ‘We are going to focus on enhancing and protecting those business areas, while also taking steps to ensure there is supply of housing for a growing workforce. Adequate transport infrastructure lies at the heart of what we are trying to achieve’.

- 2.32. The proposed development at Pease Pottage directly supports this aim by providing a large, well-balanced community centrally within the Coast to Capital area, at Crawley which is one of its key economic centres, and positioned close to the principal motorway and rail links.

- 2.33. Whilst the existing composting facility on the site will close, the business is to relocate to an existing site and hence there would not be a neutral economic effect in this respect.

¹⁰ SEP, page 56, 2nd paragraph, 3rd bullet point

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Summary: economic benefits

- 2.34. Overall, the predicted benefits to the local economy of granting planning permission for the Application are significant, and should be afforded considerable weight in the decision-making process with reference to NPPF paragraph 116. It is notable, that the Housing & Planning Act (2016) incorporates a requirement to consider financial benefits in the determination of planning applications (S.155), which is to come into force in the near future.

3. Alternatives to the development

- 3.1. The second bullet point under NPPF paragraph 116 refers to assessing:

'the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way'.

- 3.2. In response this section considers the following three matters:

- i. the scope for the development to be achieved, outside of the AONB;
- ii. the cost of doing so;
- iii. the ability to fulfil needs in some other way.

- 3.3. A relevant aspect of the evidence base is the Mid Sussex District SHLAA. This is dated November 2015. The SHLAA identified plots capable of delivering circa 63,793 units (on sites over 50 units) within the District. Just under half of these units are within the AONB but only a small proportion of these are in or next to existing settlement boundaries. There are only 2,974 units on four sites adjacent to settlement boundaries and within the AONB, the site at Pease Pottage being one. This is the only such site adjacent to Crawley and hence is the most suitable AONB development site which is readily available.

- 3.4. In respect of alternative non AONB sites, there are 24 sites, with capacities above 150 dwellings, which are adjacent to existing settlement boundaries. These sites have a combined capacity of circa 21,136 units. Two of the sites are within the AONB and a further two of the sites are within existing settlement boundaries. Of the remaining 20, one of the sites is a proposed allocation in the MSDP, Northern Arc for 3,500 dwellings. This leaves 19 sites with a potential capacity of circa 14,348 units. However, of all of these, the SHLAA identifies none as being deliverable in the first five years of the MSDP Plan Period. In addition, only an additional 2 sites are deemed to be developable in the 6-10 year period, comprising a total of 521 units over both sites, a combined capacity insufficient to meet that of the site at Pease Pottage.

- 3.5. Analysis of the SHLAA indicates a large proportion of the sites assessed as being not deliverable or developable, and a number of which are within the countryside, not adjacent to existing settlement boundaries. There are no sites identified in the SHLAA analysis capable of matching the Pease Pottage site.

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(i) Scope to implement the development outside of the AONB

- 3.6. In 2014, MSDC commissioned a study by LUC¹¹ to assess the capacity of the District to accommodate development, which has been used as an evidence base for the selection of strategic growth options under the MSDP. This study identified that the District is heavily constrained by environmental designations, with **92% coverage** by identified constraints (ecological, landscape, historic, air quality, flood risk, and others). More specifically, around **50% of the MSDC area** is in the High Weald AONB, with a further 10% in the South Downs National Park.
- 3.7. As such it is inevitable that many locations in Mid Sussex that are suitable for housing, are located in the AONB. This point was relevant to the appeal decisions for Handcross, West Sussex (APP/D3830/A/13/2198213) where the Inspector stated in paragraph 93 that: *"In terms of the criteria in para 116 of the NPPF, there is a clear need for residential development to overcome the shortfall in the housing land supply. Nearly half of the District [i.e. MSDC] falls within the AONB and there is no clear evidence that it is possible to fully satisfy the housing need on land outside this zone"*. A similar point is made in appeal decision APP/D3125/W/16/3143885 (West Oxfordshire)¹² where an Inspector concluded a lack of non-AONB sites or alternative means of meeting needs justified an exception being made.
- 3.8. MSDC has identified the Pease Pottage site as an allocation site in the MSDP as a direct response to the absence of deliverable alternatives outside of the AONB, where a comparable quantum of housing along with other community infrastructure such as a school, hospice, and local centre could be delivered.
- 3.9. This section provides an overview of the potential for the major 'Category 1' settlements of Mid Sussex to deliver a large scale allocation site (150 dwellings and above) as an alternative to Pease Pottage. This comprises Burgess Hill, Haywards Heath and East Grinstead; along with consideration of Crawley itself given the priority in delivering the unmet needs of that town as nearby as possible.

¹¹ http://www.midsussex.gov.uk/media/3463/6035_mid_sussex_capacity_study.pdf

¹² Land south of High Street, Milton-under-Wychwood, West Oxfordshire

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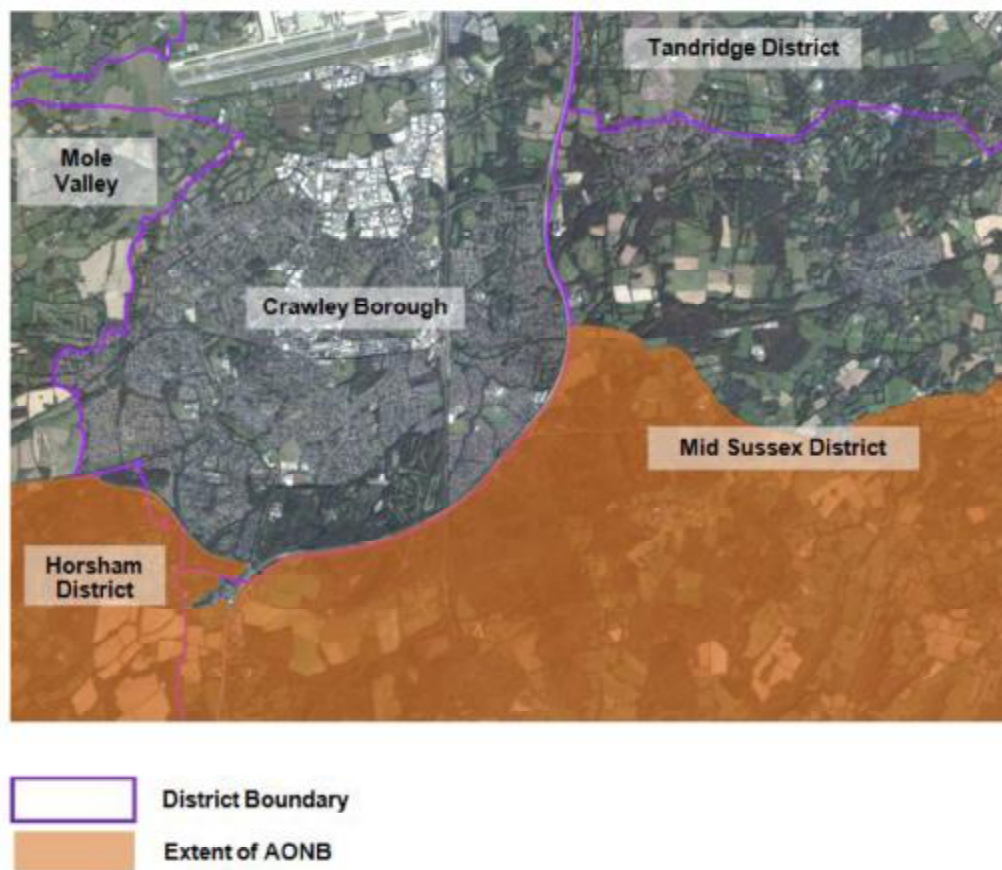
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Alternatives at Crawley

- 3.10. The boundary between Mid Sussex District and Crawley Borough is approximately 10km in length, and a general context map (showing district boundaries and the AONB) is included as Figure 1 below.

Figure 1: Context of AONB and district boundaries around Crawley



- 3.11. Apparent from this map is that land within Mid Sussex adjoining the Crawley boundary is **predominantly within the AONB**, which extends from Junction 11 (at Pease Pottage due south of Crawley) around to Turners Hill Road north east of the town.
- 3.12. Turning to the characteristics of the area around Crawley, the predominant land use within Mid Sussex is woodland, with the majority of this area being formally designated as 'Ancient Woodland', and the extent of this is shown in Figure 2 below. The Mid Sussex Capacity Study, June 2014¹³ (paragraph 2.28, 4th bullet) specifically identified that Mid Sussex is a heavily wooded district with two thirds of this being Ancient Woodland which *"needs to be protected or suitably incorporated into development while avoiding harm to the woodland"*.

¹³ http://www.midsussex.gov.uk/media/3463/6035_mid_sussex_capacity_study.pdf

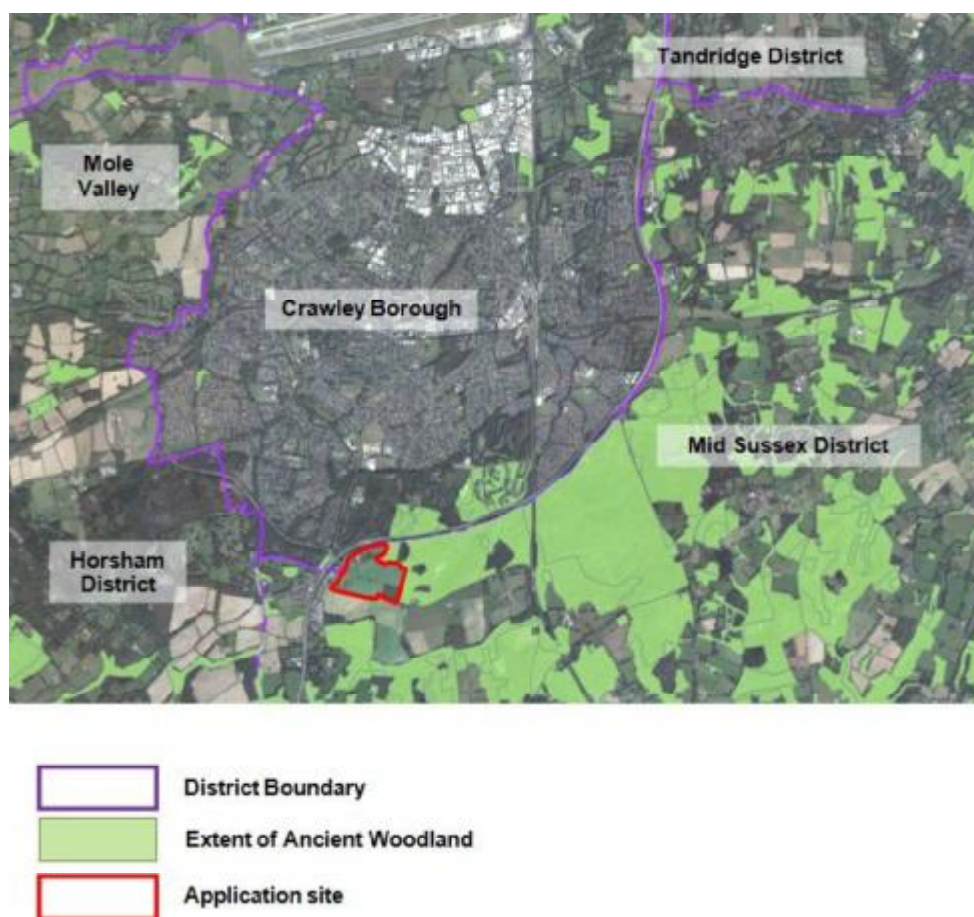
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- 3.13. Under NPPF paragraph 118 (5th bullet point), planning permission should be refused for development resulting in the loss or deterioration of ancient woodlands, *'unless the need for, and benefits of, the development in that location clearly outweigh the loss'*. Whilst a lower test than for AONB development, this represents a significant hurdle to the potential delivery of major residential development in Ancient Woodland areas; and additionally the Forestry Commission owns a substantial proportion of the designated areas, reducing the availability of land for development. Whilst a lesser designation than AONB, Ancient Woodland is nonetheless irreplaceable natural habitat and there are therefore likely be ecological constraints to developing in these areas, whereas the EIA for the Pease Pottage development confirms ecological impacts can be successfully mitigated.

Figure 2: Ancient woodland constraints around south east Crawley



- 3.14. The only land adjacent to the Crawley boundary that is not under the AONB and/or Ancient Woodland designation is to the north east of the town, close to Junction 10 of the M23. However again, as is apparent from Figure 3, woodland is a significant land use and there are few large areas of accessible and developable land. We also note that around this part of Crawley:

- the largest developable, accessible area, west of Copthorne Way, already has permission for up

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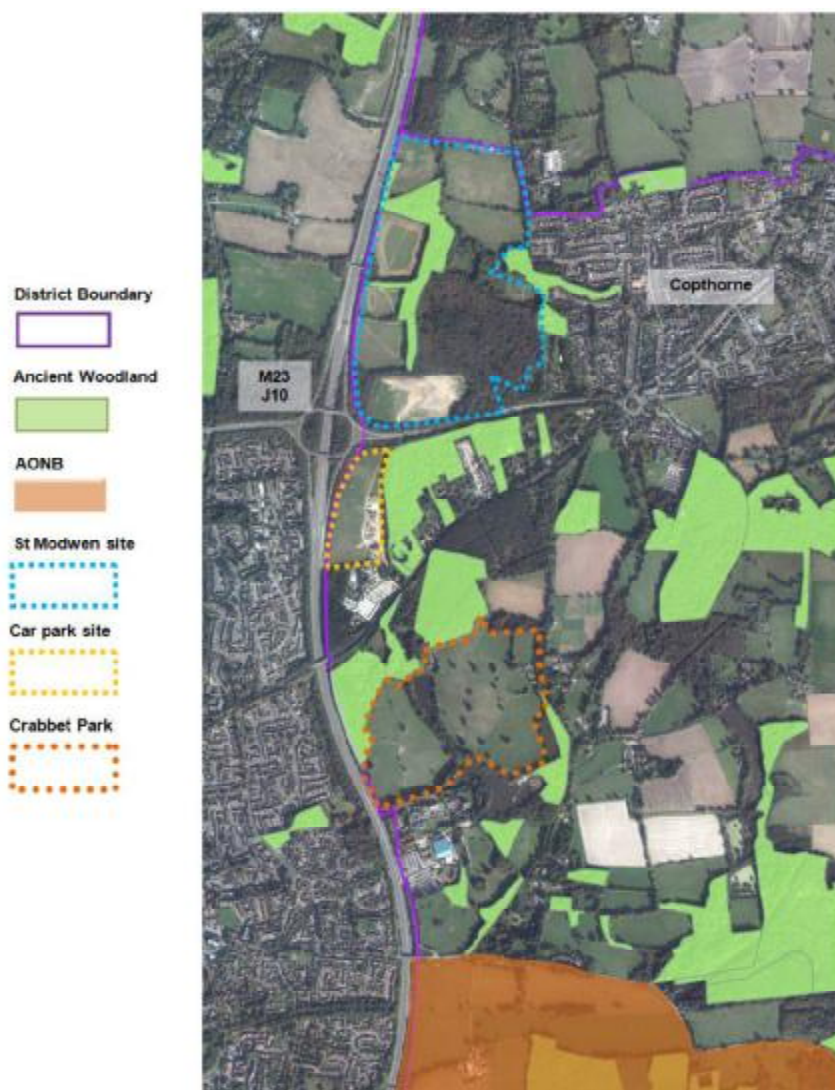
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to 500 homes, school, surgery, and 15,500sqm employment (St Modwen Developments) As shown in Figure 4 this has been considered under the SHLAA (reference 38) and already contributes to the 5 year housing land supply.

- a large tranche of land adjacent to J10 of the M23 has the benefit of consent to be developed into a 1,500 space off-site airport car park¹⁴
- one of the largest open areas relates to Crabbet Park, which though not a statutorily Registered Park and Garden, is considered a local heritage asset¹⁵. This site has been considered in the SHLAA (reference 18(WO/11)) but identified as not developable, deliverable or achievable.

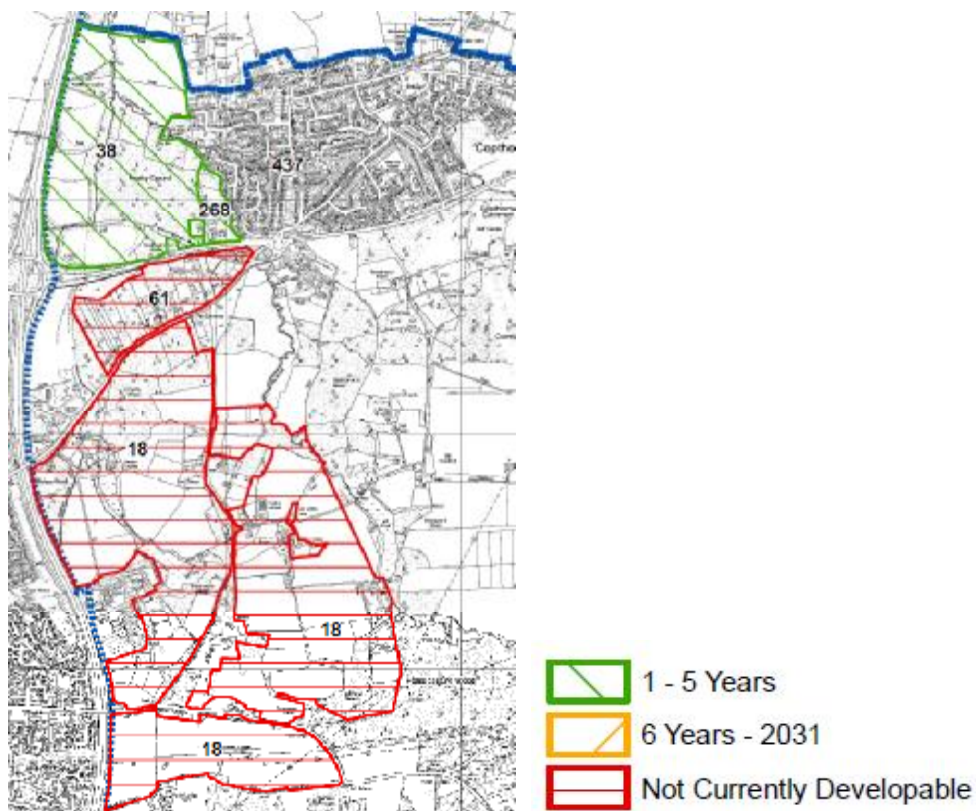
Figure 3: Constraints in non-AONB Mid Sussex District land close to M3 Junction 10



¹⁴ Application reference 12/01020/FUL

¹⁵ <http://www.crawley.gov.uk/pw/web/PUB194608>

Figure 4: Excerpt from map of sites assessed by MSDC in the SHLAA at Worth (NW of Crawley)¹⁶



3.15. Overall, it is clear that there are **no non-AONB sites** within Mid Sussex District, adjacent to Crawley, that are capable of delivering strategic housing growth to respond to the unmet needs of that town. Consequently, positive consideration should be given to the Pease Pottage site which, though positioned within the AONB, this has a number of tangible advantages, including:

- (1) that unlike most of the area it is not under the Ancient Woodland designation;
- (2) it is in a sustainable location (as discussed above) that is directly accessible to the M23 and to Crawley Town Centre;
- (3) it is of sufficient size to provide an urban extension with a mixture of uses, promoting a degree of self-containment;
- (4) the site is within a single ownership and thus deliverable; and also technically developable as demonstrated by the supporting documentation and consultee replies to the current application;

¹⁶ http://www.midsussex.gov.uk/media/3657/worth_all_assessedsites.pdf

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(5) because the site is located to the south east of Crawley as opposed to the east or south west, it ensures that the coalescence of Crawley with other larger settlements (particularly Copthorne, Crawley Down and Horsham) is avoided whilst still ensuring local residents remain in the locality and in a sustainable location.

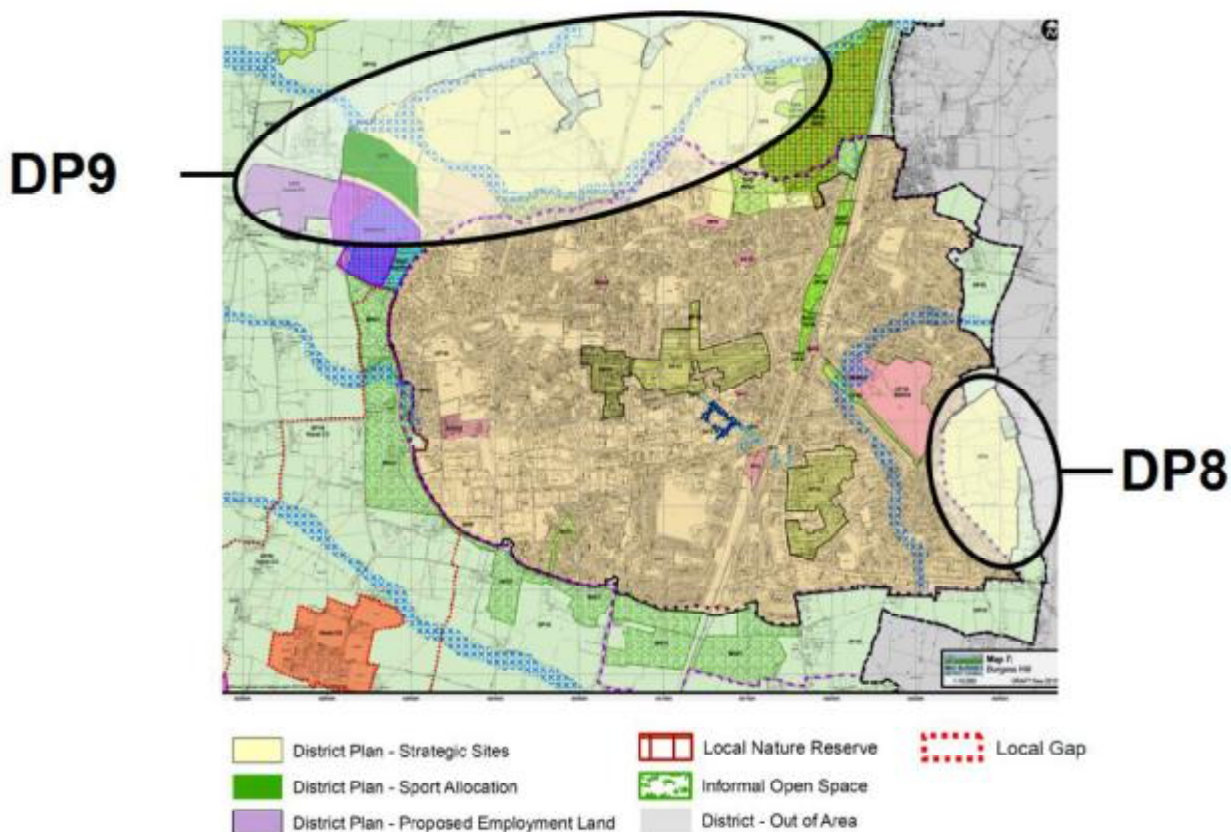
Alternatives at and around Burgess Hill

3.16. Burgess Hill has been identified in the draft MSDP¹⁷ as less constrained than Haywards Heath and East Grinstead and correspondingly, two strategic allocations of housing land are made at the town:

- **Policy DP8** (to the east of Burgess Hill at Kings Way) encompassing up to 480 homes, open space and a local hub; and,
- **Policy DP9** (to the north and north-west of Burgess Hill) encompassing approximately 3,500 homes, neighbourhood centres, education, health, employment, leisure and community uses.

3.17. The broad positions of these strategic allocations are identified in Figure 5 below.

Figure 5: MSDP Strategic Allocations around Burgess Hill (draft Proposals Map 7, Nov 2015)



¹⁷ Paragraph 3.18, page 17 of the June 2015 draft

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3.18. At Burgess Hill, a total of 5 non-AONB sites over 150 units in size have been identified in the SHLAA process:

- Land to the north/east of Burgess Hill (155 units)
- Land rear of 88 Folders Lane (242 units)
- Land south of Janes Lane, Land south of Folders Lane and east of Keymer Road, Burgess Hill (245 units)
- Victoria Business Park (1,015 units)

3.19. However, MSDC has identified in each case that these are not deliverable or developable at any of the assessed phases (1-5 years, 6-10 years and 11+ years). Closer review of Burgess Hill reinforces why there is a lack of potential available and deliverable large sites around the town:

- i. As indicated in Figure 5 above, most of the northern boundary of Burgess Hill is encompassed by the proposed mixed-use allocation DP9; from the Goddards Green area close to the A2300, eastwards around to Freck's Lane / Lowlands Farm;
- ii. Continuing in a clockwise direction around the town, to the east of DP9 is a Local Nature Reserve (Bedelands Farm), after which is an extensive tract of land around the east of Burgess Hill that is within the Wealden district.
- iii. The only substantive area of unconstrained MSDC land adjacent to Burgess Hill is then to the south east of the town, and is encompassed within the DP8 allocation area as indicated above;
- iv. To the south and west of Burgess Hill, there is no contracted developer interest and land is under ownerships, including MSDC ownership along the western edge of Burgess Hill. We note also that the periphery of the built-up area is largely encompassed by Open Space and 'Local Gap' designations; carried forward from the previous Local Plan.

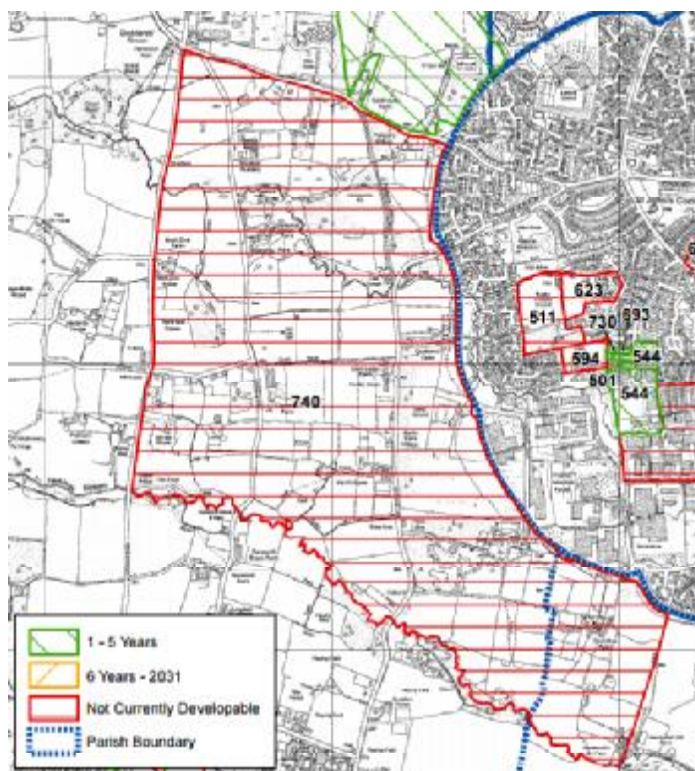
3.20. MSDC has previously considered the potential for a major allocation of land to the west of Burgess Hill, between the A273 and Cuckfield Road (Figure 6 below, SHLAA reference 740). However, this area has been identified as not currently developable. This is due to a number of environmental, technical and ownership constraints which are not capable of being resolved during the current plan period.

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Figure 6: Excerpt from map of sites assessed by MSDC in the SHLAA at Burgess Hill ¹⁸



- 3.21. In summary, there is no capacity at Burgess Hill to bring forward an additional large-scale non-AONB housing site as an alternative to Pease Pottage, within the 5 year period necessary to fulfil housing requirements. It is also pertinent that Burgess Hill is at a significant distance from Crawley and thus less appropriate as a location to deliver unmet needs at Crawley, than Pease Pottage itself.

¹⁸ http://www.midsussex.gov.uk/media/3703/burgesshill_assessedsites_x.pdf

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Alternatives at and around Haywards Heath

3.22. At Haywards Heath (with Lindfield), a total of 10 non-AONB sites over 150 units in size have been identified in the SHLAA process:

- Land at Gravelye Lane and Scamps Hill (158 units)
- East of High Beech Lane (326 units)
- Spring Lane, (350 units)
- Hurst Farm, Hurstwood Lane (357 units)
- Land North of Wickham Way and East of Birchen Lane (368 units)
- Land South of Scamps Hill (385 units)
- Land to the north of Scamps Hill (490 units)
- Haywards Heath Golf Course, High Beech Lane (511 units)
- Eastlands, Lewes Road, Scaynes Hill (735 units)
- Land north east of Lindfield (1225 units)

3.23. However, none of the above have been identified as deliverable within 1-5 years, with only the Hurst Farm site deliverable within years 6-10 / 11+ and Land at Gravelye Lane in years 11+

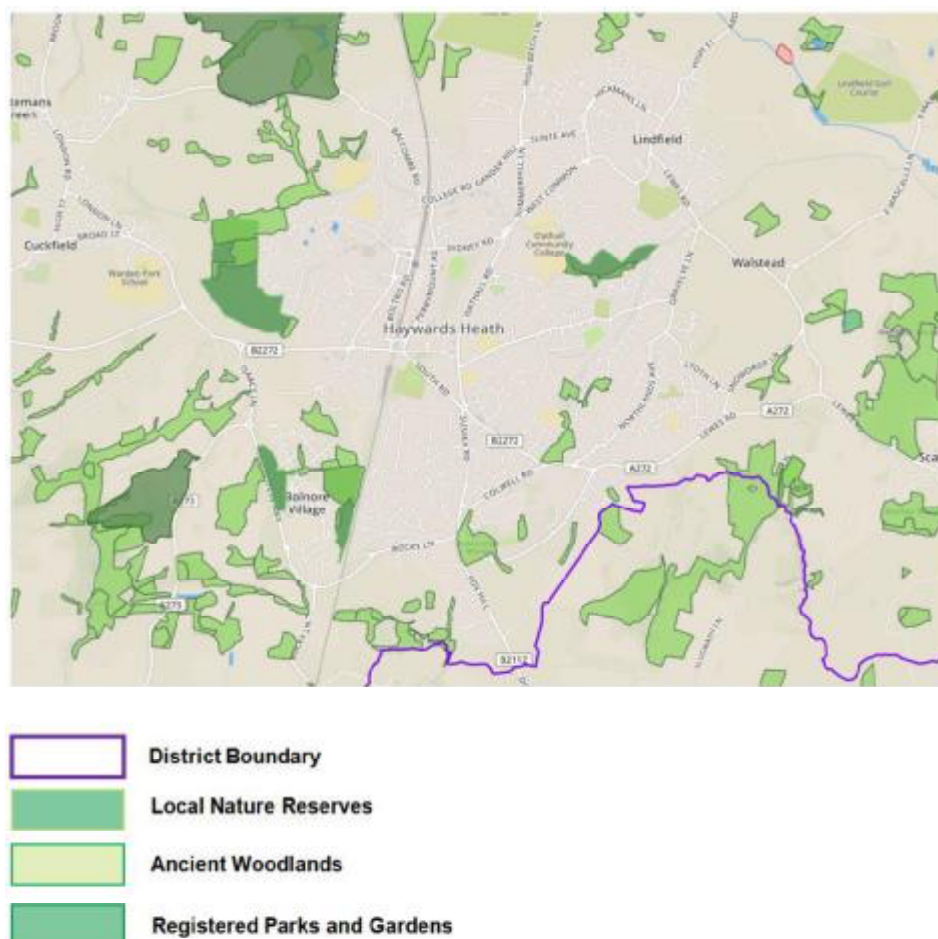
3.24. Although identified as a 'Category 1' settlement, the MSDP has for several reasons not identified strategic allocations of land at Haywards Heath, and closer review reinforces why there is a lack of large sites around the town potentially deliverable within a 5 year timeframe. The town is significantly more constrained in ecological and heritage terms than Burgess Hill, with much of the perimeter of the town either within or adjacent to formal designations, particularly Local Nature Reserves, Ancient Woodlands, and Registered Parks and Gardens. As indicated in Figure 7 these are scattered around the town, with a particular concentration to the west and south-west. Whilst a lower test applies to such designations than to AONB development, combined with complexities in land ownership they introduce a significant hurdle to the assembly and potential delivery of major residential development sites as alternatives to Pease Pottage.

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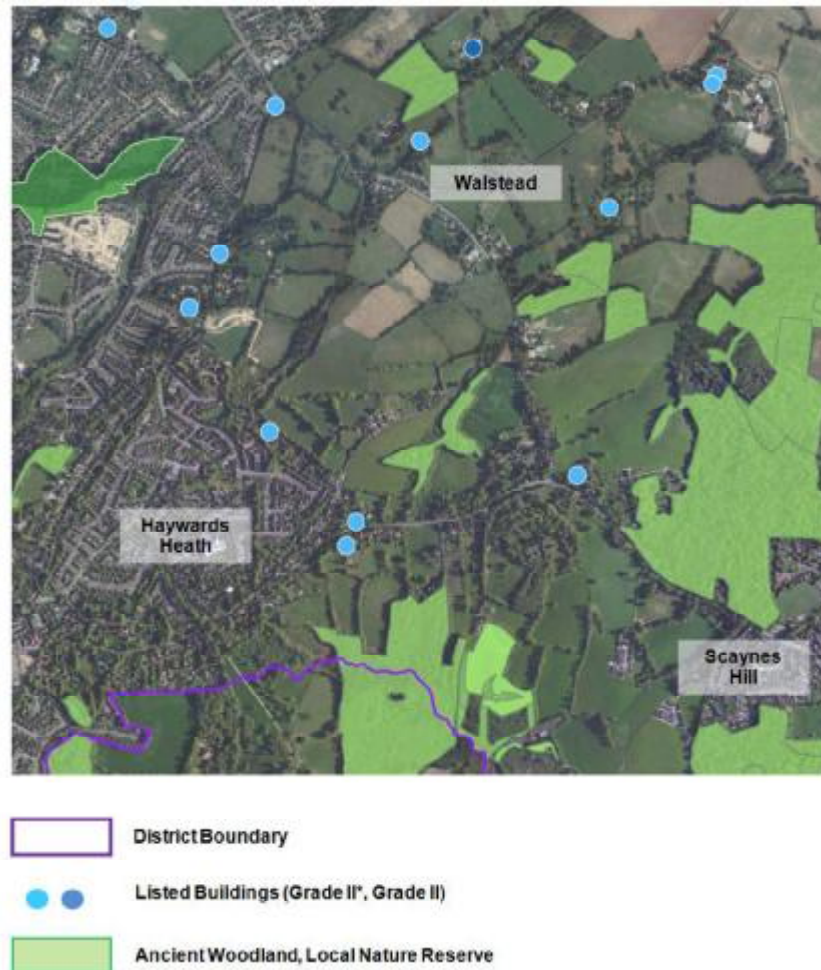


Figure 7: Context of AONB and district boundaries around Haywards Heath



- 3.25. Within the LUC study, paragraph 2.28 (3rd bullet) specifically notes the number of ecological constraints around the town, *'whose special characteristics need to be protected and for which damage from development in these locations needs to be avoided.'* Some areas to the southeast of Haywards Heath are less dominated by such constraints, however as can be seen from Figure 7 above, the district boundary falls nearby limiting the potential for MSDP allocations in this area.
- 3.26. There are areas east of Haywards Heath that are not encompassed by ecological designations, however (as indicated in Figure 8 below) this area is particularly affected by undulating topography, multiple ownerships, and a dense network of small fields, with a significant concentration of listed buildings. Strategic development in this area is thus not appropriate, and would contribute to the merging of settlements such as Walstead and Scaynes Hill.
- 3.27. This area, equally, lacks adequate highway infrastructure and it has been noted in the LUC study (table 2.3) that the Scaynes Hill Wastewater Treatment Works lacks adequate capacity to accommodate additional development.

Figure 8: Constraints to the east of Haywards Heath



- 3.28. As such, there is no capacity at Haywards Heath to bring forward an additional strategic non-AONB housing site as an alternative to Pease Pottage, within the 5 year period necessary to fulfil housing requirements. As with Burgess Hill, it is also pertinent that Haywards Heath is at a significant distance from Crawley and thus less appropriate as a location to deliver unmet needs at Crawley, as compared with the application site at Pease Pottage.

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Alternatives at and around East Grinstead

- 3.29. Although a 'Category 1' settlement, East Grinstead is a significantly constrained location for strategic growth. As indicated in Figure 9 below, the southern and eastern edges of the town are enveloped by the AONB, whilst the northern edge of the town closely follows the boundary to Tandridge district. To the south and west of the town, there is significant coverage by Ancient Woodland.

Figure 9: Key constraints around East Grinstead

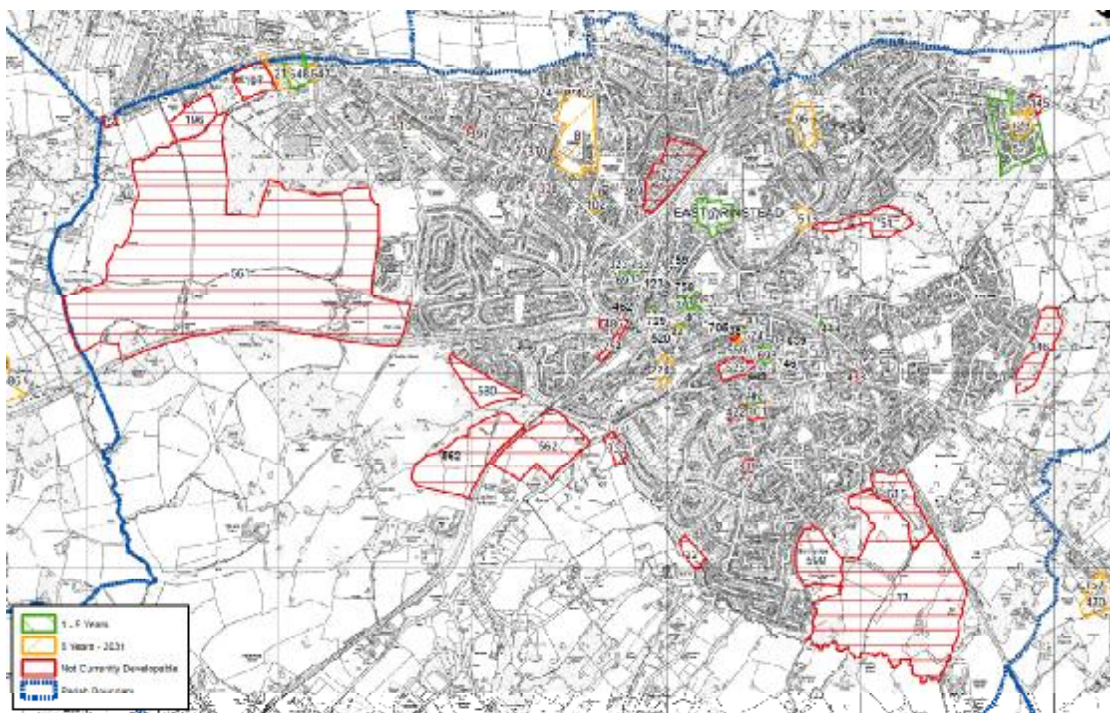


- 3.30. Therefore, insofar as there is potential for strategic development at East Grinstead, this would be limited to the less constrained areas around Imberhorne Farm, to the west of the town. This area has been assessed in the Council's SHLAA (2016 edition¹⁹), with an area of 120 hectares having been considered (site reference 561 (EG/A/30)). However, the Council's conclusion was that this site is not deliverable within the 1-5 year period, and not developable within the 6-10 or 11+ year period. A range of other sites towards the south west of East Grinstead have also been considered in the MSDC SHLAA, and excluded on the basis of unsuitability²⁰ or unavailability.²¹

¹⁹ http://www.midsussex.gov.uk/media/3692/eastgrinstead_shlaa_chapters_2016.pdf

²⁰ Including Site 562 (Hill Place Farm)

Figure 10: Excerpt from map of sites assessed by in the SHLAA at East Grinstead²²



3.31. At East Grinstead, overall a total of 5 non-AONB sites over 150 units in size have been identified in the SHLAA process:

- Charlwoods Industrial Estate (200 units)
- Imberhorne Lower School, Windmill Lane (325 units)
- Land at Hill Place Farm to the south west of East Grinstead, west and east of the Bluebell Railway Line (1,306 units)
- Land to the west of East Grinstead (land at Imberhorne Farm), 3,080 units.

3.32. Of the above, only Imberhorne Lower School is considered to be developable, albeit not until the 11+ year period, whilst the others are not considered developable at any stage. As such, there is no potential at East Grinstead to bring forward an additional strategic non-AONB housing site as an alternative to Pease Pottage, within the 5 year period necessary to fulfil housing requirements.

3.33. There are a number of other relevant considerations for potential strategic growth at East Grinstead, including:

²¹ Including Site 580 (Land north of Hill Place Farm and south of Worth Way)

²² http://www.midsussex.gov.uk/media/3686/eastgrinsteadx_assessedsites.pdf

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- that the entire town is positioned within the 7km buffer around the Ashdown Forest SPA/SAC²³, encompassing the area where residential development would, by definition, be considered to have an adverse effect unless appropriately mitigated;
- a lack of waste water treatment capacity, to accommodate planned housing development. This was reported in the LUC capacity study²⁴ and this affects the Luxford Lane Wastewater Treatment Works (WWTW) which serves the southern part of the town, as well as the Eden Vale WWTW which serves the north and east of the town (LUC study, table 2.3).
- there is an exceedence of NO₂ in terms of Air Quality Regulations at London Road in East Grinstead (LUC capacity study, paragraph 2.89);

3.34. In summary, there is no capacity at East Grinstead to bring forward an additional strategic non-AONB housing site as an alternative to Pease Pottage, within the 5 year period necessary to fulfil housing requirements.

Alternatives elsewhere in Mid Sussex

- 3.35. Across the remainder of the District, a further 24 non-AONB SHLAA sites of above 150 dwellings have been identified²⁵. However, of these only one is deliverable within the 5 year period, and this relates to the Northern Arc proposal which is already the subject of the DP9 allocation.
- 3.36. One further site (land south of Rocky Lane and west of Weald Rise, Ashurst Wood) has been identified as developable within the 6-10 and 11+ year period however this comprises only 164 dwellings²⁶. One further site has been identified as developable within the 11+ year period only, however this relates only to 158 dwellings²⁷.

Scope to implement the development outside of the AONB: Summary

- 3.37. Overall, it is clear that there is not a sufficient supply of non-AONB sites within MSDC that would be capable of being delivered as an alternative to the proposed application at Pease Pottage.

²³ <http://www.midsussex.gov.uk/media/3247/hra7kmdistrictmap.pdf>

²⁴ http://www.midsussex.gov.uk/media/3463/6035_mid_sussex_capacity_study.pdf

²⁵ See table in Appendix 1

²⁶ Land south of Rocky Lane & to the west of Weald Rise and Fox Hill Village, Ashurst Wood

²⁷ Land at Gravelly Lane and Scamps Hill, Lindfield

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(ii) Cost of implementing the development outside of the AONB

3.38. From the foregoing analysis, it is apparent that there is minimal potential to bring forward alternative sites of 150+ dwellings elsewhere in the district, let alone a strategic-scale urban extension of the nature of Pease Pottage.

3.39. As such the costs of implementing development outside of the AONB would include:

- **Delays;** which would result if, for instance, reliance was placed on attempting to accelerate delivery of a diverse range of smaller non-AONB sites across the District, including those SHLAA sites listed in this document, compared with Pease Pottage which is capable of early delivery;
- **Undermining of housing supply:** Development of the Pease Pottage site could, potentially, commence in 2017, with circa 50 dwellings completed by 2018. Thereafter, and combining both open market and affordable sales, up to 150 dwellings per year are achievable until 2023 when the development would be completed. This could add 10% to the five year housing land supply in the period 2016-21. The Hospice will be delivered from 2019;
- **Failure to meet Crawley's unmet housing/ hospice need locally;** for instance if this were to be provided in southern areas of the District, promoting a less compact form of development. A series of smaller sites would also potentially not lead to the same level of affordable housing provision, and would fail to meet the needs for hospice care in the locality of Crawley;
- **Uncertainty,** which would arise from attempting to restructure the settlement hierarchy and spatial approach in the emerging MSDP;
- **A missed site-specific opportunity** to provide upgrades to M23 J11 and governmental aims to improve regional transport infrastructure;
- **Additional infrastructure costs** as may be necessary in seeking to deliver alternative sites in a less accessible or well-served location (new wastewater treatment capacity being one example, as highlighted for East Grinstead and Haywards Heath).

3.40. Overall, there are significant and specific costs in not releasing the AONB development site at Pease Pottage, and conversely a range of benefits in doing so. As in the West Oxfordshire case cited earlier²⁸, these are all pertinent in considering the planning balance in terms of NPPF paragraph 116.

²⁸ Appeal Decision APP/B3125/W/16/3143885

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(iii) The ability to fulfil housing needs in some other way

3.41. The preceding sections have already considered in considerable detail why the housing needs could not be accommodated elsewhere in the district outside of the AONB on sites considered in the SHLAA. Beyond this, other alternative approaches are limited and not likely to be deliverable, for instance:

- **Brownfield development:** Mid Sussex is characterised by only circa 9% built development, and the principal population centres ('Category 1' in MSDC's Settlement Hierarchy²⁹) are Burgess Hill, Haywards Heath, and East Grinstead with populations of circa 30,000, 27,000 and 26,000 respectively. As such, opportunities for significant new development within urban areas are limited and there is no prospect of (or need for) significant urban renewal to bring forward major residential developments as an alternative. In addition, the density and form of development in these locations would less likely lend itself to be a similar project to the proposal (i.e. lower density/ model village development, incorporating a Hospice).
- **Delivering in another authority area.** In certain circumstances it could be considered an alternative option to transfer an authority's housing requirement to another districts and thereby non-AONB locations. However, the prospect of this largely depends on whether an up to date Plan is in production, or not recently adopted. Plans in Horsham, Crawley, Reigate & Banstead and Brighton & Hove have recently been adopted. In other locations, there is already limited scope to meet the objectively assessed housing needs based on the present housing requirement (i.e. wider housing shortfalls). It is considered very unlikely that any adjacent Local Authority could meet any unmet housing need from Mid Sussex District.
- **Provision of a new settlement** There are no credible planning promotions at this time for a new settlement in Mid Sussex District. Land at 'Mayfields' in Horsham District had been promoted for circa 10,000 dwellings, however this site covered two Districts, and was dismissed by the Horsham District Planning Framework Inspector in 2015. It is not known that there are any other active promotions for a new settlement in the District.

3.42. Overall, we consider there is no alternative to the approach set out by MSDC, i.e. to allocate the Pease Pottage site in the emerging MSDP in accordance with a thorough consideration of site constraints, opportunities and deliverability.

²⁹ http://www.midsussex.gov.uk/media/3455/settlement_sustainability_review_final.pdf

4. Effects of the development

- 4.1. The third bullet point under NPPF paragraph 116 refers to assessing:

'any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated'

- 4.2. In response this section considers the following matters, in all cases taking into account the moderating impact of the mitigation, enhancement and control measures proposed in the Application:

- i. effects of the proposed development on landscape;
- ii. effects on recreational opportunities;
- iii. other environmental effects.

(i) Effects of the proposed development on landscape

- 4.3. The Environmental Statement which accompanied this application has examined the potential landscape effects of the development in a full Landscape and Visual Impact Assessment (LVIA). For a fully detailed account of this process, reference should be made to Chapter 9 of the Applicant's Environmental Statement (ES) (November 2015), supplemented by further visualisations (March 2016). However the landscape effects of the proposed development on the AONB are now summarised.
- 4.4. The application would replace approximately 32.15 ha of farmland, and 2.18 ha of land covered by a composting facility and farm complex, with a new neighbourhood set within an extensive area of open space. The design of the open spaces has been led by the character of the wider area, and will consist of over 19ha of meadows, native woodland, ponds and amenity grass. The open space design has also been specifically structured so as to integrate the new buildings with the wider area, allowing for significant strips of woodland around the site's western, northern and southern boundaries. Buildings have been located and designed so as to restrict their visibility, minimising their height and avoiding the most visually sensitive areas of the site. The current visual setting of the site is limited by dense woodland to the north and east and strong hedgerows on its western side. The southern edge, adjacent to Parish Lane also benefits from an area of dense woodland, as well as hedgerows that incorporate forest-scale oak trees. In allowing the recent appeal in West Oxfordshire³⁰, the Inspector decision affirmed similar factors in considering AONB impacts.
- 4.5. As a result of the existing landscape setting and the scheme's inherent landscape and visual mitigation measures, the Application will not have a significant adverse effect on the landscape or visual amenity of the wider AONB. Views of the new development will be from an extremely limited area, and include only glimpses of new buildings. In general, the scheme will reinforce the wooded character of the AONB and help replace the urban fringe character provided by the car boot sale, farm complex and composting facility with a high quality residential scheme set within a landscape structure that reflects and reinforces the wider landscape character.

³⁰ Appeal Decision APP/B3125/W/16/3143885

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- 4.6. The LVIA also shows that the application would generally have beneficial effects on the site's landscape features, some of which would be significant. The management of the existing areas of woodland would be beneficial, as would the substantial volume of new tree and shrub planting, together with wild flower meadows and wetland species. The proposals would also positively effect water features as the existing woodland pond is retained and actively managed, and new permanent ponds are created as part of the SUDS. There would also be numerous rain gardens and swales created as part of the SUDS overall, providing opportunities for a varied selection of new marginal and aquatic plant species. The proposals would also be beneficial in replacing the existing farm complex and composting facility land uses, with areas of open space and high quality housing development.
- 4.7. With regards to visual amenity, the LVIA shows that the number of visual receptors and extent of area that have views towards the site is already extremely limited and the proposed development structure with integral open spaces and tree planting both within the site and adjacent to its edges, would help to visually integrate the site with the surrounding area. The proposals would therefore not result in any significant adverse visual effects.
- 4.8. Additional visualisations submitted with the application show that the views of the development from the south will change from a large open arable field to one that is more wooded in character, and in some places contains glimpses of the rooftops of proposed buildings. Until the proposed tree planting establishes, some of the closer views will have a more urban feel, with clear views of new housing, however this will significantly change as the new woodland establishes. It is important to recognise that the views from the south are not of the highest scenic quality compared to other parts of the AONB, containing urban fringe/ visual detractors such as highways, kerbs, street lighting, signage, pylons, overhead cables and large modern agricultural sheds. The site and the farmland to the south are also not typical of the highest quality landscapes within the AONB, consisting of large arable fields rather than the smaller, irregular medieval field patterns that are more typical of the High Weald. The introduction of new woodland to the views will instead help to integrate the new development with the character of the adjacent Tilgate Forest and reinstate the site's original historic wooded character.
- 4.9. Overall, the statement and accompanying visualisations confirm that the proposed development would not create significant harm to the AONB, and that there would be some beneficial effects.

(ii) Effects of the proposed development on recreational opportunities

- 4.10. The application at Pease Pottage provides significant recreation opportunities, both off site and on site. With regards to on-site provision, there is considerable potential for on-site recreation on the basis that circa 50% of the site is proposed as open spaces (either informal or formal) including the potential to utilise the school site for recreation.
- 4.11. More broadly, as part of the Section 106 and impact mitigation proposals, access into Tilgate Forest will be promoted and this has been supported by Natural England in its revised consultation response on the application (16 March 2016). This will provide a recreational benefit, and the development will contribute additional funding towards the management of the forest, provision of forestry commission wardens, management company, and more generally a sense of ownership by local people.
- 4.12. Collectively these improvements are significant in promoting understanding and appreciation of the AONB

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and the Ancient Woodland and fostering sustainable recreation activities. Overall the development will attract positive environmental effects through the provision of new recreational space etc. to demonstrate the exceptional circumstances necessary to justify development in accordance with NPPF paragraph 116.

(iii) Other environmental effects of the proposed development

4.13. Other environmental effects of the development have also been closely considered in the Environmental Statement, and are summarised below.

- **Traffic & Transport:** The proposed development includes a series of on and offsite improvements to the local road network that will enhance connectivity including pedestrian and cycle links and public transport. Whilst some effects are predicted upon pedestrian and cyclist amenity adjacent to the site, these are not significant. In the vicinity of M23 J11, as a result of the proposed measures, the proposals will significantly increase road safety and reduce the risk of accidents.
- **Noise & Vibration.** No significant noise or vibration would be generated by the proposed development, and through a combination of acoustic bunding and fencing it will be ensured that noise will not result in significant effects upon residents of the proposed development.
- **Air Quality & Odour.** During construction, standard practice measures (e.g. stockpile damping, drop height limits) will be employed to ensure that no significant air quality effects arise. Upon occupation, the predicted change in air quality will be negligible.
- **Ecology.** The proposed development will not impact upon any designated ecological sites. The proposed landscape and ecological design will increase the quality and diversity of habitats within the site, benefiting a range of species. Overall, the proposals are predicted to have a beneficial effect in relation to wildlife.
- **Water Environment.** Suitable management of the construction phase through an Environmental Management Plan will ensure that no significant effects upon the water environment will occur. Upon occupation, through ongoing liaison with the Local Drainage Authority it will be ensured that sufficient capacity is provided within the local network in terms of both water supply and drainage.
- **Ground Conditions.** With the implementation of suitable mitigation measures, no effects associated with ground contamination are predicted. Based upon a detailed assessment of agricultural land it is concluded that the proposed development would not adversely impact upon agricultural activities.
- **Archaeology.** A programme of targeted archaeological investigation and recording is proposed in advance of the development proceeding. This will ensure that the development will not result in any significant archaeological effects.

4.14. Overall, after detailed specialist assessment, the environmental effects of this application have been shown to be acceptable, and indeed various positive effects would arise from the scheme's delivery.

4.15. **Overall the development will attract positive environmental effects to demonstrate the exceptional circumstances necessary to justify development in accordance with NPPF paragraph 116.**

5. Conclusion

- 5.1. The purpose of this Planning Statement Addendum is to provide a detailed and justified evaluation of the Application against paragraph 116 of the NPPF. It contains three principal sections, structured around the three bullet points of paragraph 116, which in essence relate to:
- the **need** for the development (Section 2);
 - possible **alternatives** to the development (Section 3);
 - consideration of the **impacts** of the development (section 4).
- 5.2. This Statement demonstrates that the Application is fundamentally justified under all three, being necessary to fulfil housing needs; the only deliverable means of doing so; and capable of being implemented without significant adverse effects.

Need

- 5.3. In respect of the Need for the development, this is based on:
- the severe and persistent absence of a five year housing land supply in the District (see separate technical note on this matter);
 - the location of the development proposal based on the acknowledged unmet needs of Crawley;
 - various national considerations, notably highways network enhancements to the M23, and the provision of hospice care;
 - wider economic benefits.
- 5.4. Overall, the predicted benefits to the local economy of granting planning permission for the Application are significant, and should be afforded considerable weight in the decision-making process with reference to NPPF paragraph 116. It is notable that the Housing & Planning Act (2016) incorporates a requirement to consider financial benefits in the determination of planning applications (S.155), which is to come into force in the near future.

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Alternatives

- 5.5. Notwithstanding the fact that the site is proposed as a draft allocation in the emerging District Plan (MSDP) as tested by the emerging Mid Sussex District Council (MSDC) evidence base, as the Plan is still to be adopted, at this time, the site is still within the High Weald AONB. The relevant evidence base indicates that the District is highly constrained by environmental designations, circa 92% coverage. Over half of the MSDC area is within the AONB.
- 5.6. The Mid Sussex District SHLAA (November 2015) identified 24 non AONB sites with capacities above 150 dwellings and which are adjacent to existing settlement boundaries. These sites have a combined capacity of circa 21,136 units, however, excluding Northern Arc (which is a proposed MSDP allocation for 3,500 dwellings) none of these sites are identified within the SHLAA as being deliverable in the first five years of the MSDP Plan Period. In addition, only an additional 2 sites are deemed to be developable in the 6-10 year period, comprising a total of 521 units over both sites, a combined capacity insufficient to meet that of the site at Pease Pottage.
- 5.7. Analysis of the SHLAA indicates a large proportion of the sites assessed as being not deliverable or developable, and a number of which are within the countryside, not adjacent to existing settlement boundaries. There are no sites identified in the SHLAA analysis capable of matching the Pease Pottage site.
- 5.8. Notwithstanding the SHLAA analysis, this Planning Statement Addendum has reviewed potential development areas around four groups of locations where a similar scale of development could (theoretically) be accommodated:
- **Locations around Crawley, Burgess Hill, Haywards Heath and East Grinstead:** The analysis demonstrates that for a combination of land availability, scale and environmental constraints reasons, there are no available sites (which are deliverable) of a scale capable of accommodating 150+ dwellings, on land immediately adjacent to these four dominant settlements.
 - **Brownfield development:** Mid Sussex is characterised by only circa 9% built development, and the principal population centres are Burgess Hill, Haywards Heath, and East Grinstead with populations of circa 30,000, 27,000 and 26,000 respectively. This restricts development opportunities akin to the Pease Pottage proposal.
 - **Delivering in another authority area:** There are limited opportunities for any unmet need in Mid Sussex to be met by adjacent Authorities, many of whom are struggling to meet their own housing needs.
 - **Provision of a new settlement:** There are no credible planning promotions at this time for a new settlement in Mid Sussex District. Land at 'Mayfields' in Horsham District had been promoted for circa 10,000 dwellings, however, this was dismissed by the Horsham District Planning Framework Inspector in 2015.

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Impacts

- 5.9. Overall the development will attract positive environmental effects to demonstrate the exceptional circumstances necessary to justify development in accordance with NPPF paragraph 116. This Addendum has had regard to landscape, recreational and other impacts, and demonstrates the positive net benefits arising from the proposal.

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Appendix 1: Other non-AONB SHLAA sites 150 dwellings+

Site	Area	SHLAA ref	Units
Land at Gravelye Lane and Scamps Hill, Lindfield	Lindfield and Lindfield Rural	6	158
Land south of Rocky Lane & to the west of Weald Rise and Fox Hill Village, Haywards Heath	Ashurst Wood	496	164
Hangerwood Farm, Foxhole Lane, Bolney	Bolney	665	175
Land adjacent to the Haven Centre, Hophurst Lane, Crawley Down	Worth	275	175
Land west of Truggers, Handcross	Slaugham	181	189
Land at Wheatsheaf Lane, Cuckfield	Cuckfield	11	193
Land east of College Lane, Hurstpierpoint	Hurstpierpoint	19	193
Land north of the Kings Business Centre, Reeds Lane, Sayers Common	Hurstpierpoint	751	245
Land to the north of Copthorne Road, Copthorne	Worth	61	280
Land east of Borde Hill Lane, Haywards Heath	Ashurst Wood	556	298
Coombe Farm, London Road, Sayers Common	Hurstpierpoint	601	315
East of High Beech Lane, Haywards Heath	Lindfield and Lindfield Rural	76	326
Spring Lane, Lindfield	Lindfield and Lindfield Rural	77	350
Land South of Scamps Hill, Lindfield	Lindfield and Lindfield Rural	483	385
Land to the north of Scamps Hill, Lindfield	Lindfield and Lindfield Rural	237	490
Haywards Heath Golf Course, High Beech Lane,	Lindfield and Lindfield Rural	503	511
Land north of Cuckfield by-pass, Cuckfield	Cuckfield	240	630
Eastlands, Lewes Road, Scaynes Hill	Lindfield and Lindfield Rural	515	735
Land south of Cuckfield Village, Cuckfield	Cuckfield	65	753
Land north east of Lindfield	Lindfield and Lindfield Rural	498	1225
Broad location to the West of Burgess Hill	Hurstpierpoint	740	3395
Land to west of Turners Hill Road, Crawley Down	Worth	688	3492
Northern Arc, Burgess Hill	Ansty and Staplefield	493	3500
Crabbet Park, Old Hollow, Near Crawley	Worth	18	6020

Appendix 2 - Savills' assessment of housing land supply (July 2016)

(From Thakeham's application at Pease Pottage, ref DM/15/4711)

Mid Sussex Five Year Housing Land Supply Report

Land East of Brighton Road, Pease Pottage

Mid Sussex Five Year Housing Land Supply Report

Land East of Brighton Road, Pease Pottage



Mid Sussex Five Year Housing Land Supply Report

Land East of Brighton Road, Pease Pottage



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Mid Sussex Five Year Housing Land Supply Report

Land East of Brighton Road, Pease Pottage



1. Statement of Purpose

- 1.1. The purpose of this report is to assess the five year land supply position of Mid Sussex District Council. This assessment is produced to support the planning application at Land East of Brighton Road, Pease Pottage.
- 1.2. The site is located on the western edge of Mid Sussex, immediately adjacent to the town of Crawley within Crawley Borough Council. An outline application was submitted in November 2015 for the following development:

The phased development of residential units (including affordable housing) (Use Class C3), care facility (Use Class C2), community building (Use Class D1), café (Use Class A3), retail (Use Class A1), up to 1 form entry primary school (Use Class D1), hard/soft landscaping including a noise bund/ fence, infrastructure provision, creation of accesses and car parking. Application includes demolition of 2 dwelling houses, ancillary agricultural buildings, removal of waste facility and stopping up existing vehicular access (post construction). Outline permission is sought, with matters of access only for approval.
- 1.3. In addition to this application, a detailed submission was made for the first phase of the scheme for 156 dwellings (Use Class C3), a care facility (Use Class C2), a shop (Use Class A1), a café (Use Class A3) and a community building (Use Class D1).
- 1.4. This statements sets out the five year land supply position of Mid Sussex DC and how the scheme at Pease Pottage makes a positive contribution to the supply within the area. The report assesses the current five year land supply from three different scenarios. This includes the Council's position at November 2015, as well as Savills position with and without the Pease Pottage delivery rates. The report also examines the historic shortfall of the Council, its housing requirement and the unmet needs of neighbouring authorities.

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2. Historic Delivery

National Planning Policy Framework (NPPF) buffer

- 2.1. The NPPF states at paragraph 47 that a local authority's housing supply must include a buffer of 5%. However, in cases where there has been "a persistent under delivery of housing, local planning authorities should increase the buffer to 20%..."
- 2.2. A description as to what would constitute a 'persistent under-delivery' of housing is the Judgment of Mr Justice Lewis in the case of Cotswold District Council v Secretary of State for Communities And Local Government & Anor [2013] EWHC 3719 (Admin) (27 November 2013). This includes the statement that:
- 'In the context of paragraph 47, the reference to "persistent" under delivery of housing is a reference to a state of affairs, under delivery of housing, which has continued over time. A decision-maker would need to have regard to a reasonable period of time measured over years rather than looking at one particular point, to ensure that the situation was one of persistent under delivery rather than a temporary or short lived fluctuation.'*
- 2.3. Therefore, in order to understand the current land supply position, it is necessary to review the performance in housing completions during the period of the now revoked South East Plan, as well as the situation since 2013. In addition, it is necessary to understand the interim position between the end of the South East Plan and the start date of the emerging District Plan of 2014.

South East Plan (2006-2013) and Housing Implementation Strategy (July 2013)

- 2.4. In assessing the historic shortfall, it is necessary to review the performance in housing completions since the start of the now revoked South East Plan period in 2006. Once revoked, the Council produced the Housing Implementation Strategy (July 2013) which set the housing target 10,600 units between 2011-2031 or an average of 530 units per annum. The performance during this time helps to establish where the Authority should rightly be judged as requiring a 5% or 20% as per the requirements of the NPPF. In reviewing this, it is clear that the Council was unable to meet the target set by the South East Plan in every year up to 2013. It did reach the target set by the Housing Implementation Strategy for the year 2013/14 (prior to the start date for the emerging District Plan) but only by 6 units. It should also be noted that the Housing Implementation Strategy document was not tested by an Inspector. In addition, its housing target was far less than the 650 target for 2014-2016 and significantly less than the 800dpa now required as a result of the focused amendments.. As such, both Savills and the Council are in agreement that there is a history of persistent under delivery and therefore a 20% buffer is appropriate, in line with the requirements of the NPPF.

Table 1: Mid Sussex historic housing delivery 2006-2016

	2006 /07	2007 /08	2008 /09	2009 /10	2010 /11	2011 /12	2012 /13	2013 /14	2014 /15	2015 /16
Target	855	855	855	855	855	855	855	530	650	650
Completions	337	502	480	353	179	522	749	536	630	868

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	2006 /07	2007 /08	2008 /09	2009 /10	2010 /11	2011 /12	2012 /13	2013 /14	2014 /15	2015 /16
Difference	-581	-353	-375	-502	-676	-333	-106	6	-20	49
Cumulative Shortfall	-518	-871	-1246	-1748	-2424	-2757	-2863	-2857	-20	29

Method of Accounting for Future Shortfall

2.5. In preparing the District Plan, Mid Sussex will have had to incorporate the historic cumulative shortfall of 2,857 units into its housing requirement. As such, any current or future cumulative surplus/ shortfall will be counted from the beginning of the plan period (2014). At present, the Council has a surplus of 29 units. However, should there be a shortfall in the coming years, a method of dealing with this the shortfall needs to be implemented. There are two key methods that are used to incorporate a housing shortfall into the remaining requirement of the plan. These are the 'Liverpool' and 'Sedgefield' methods. The Liverpool method is often favoured by Local Planning Authorities due to the ability to spread the shortfall provision across the entire plan period. However, the Sedgefield method applies the shortfall within the current five year period. Whilst each planning application is determined on its own merits, it is notable that the Sedgefield method is regularly favoured by a number of authoritative sources, including the following.

National Planning Practice Guidance (PPG)

2.6. The PPG states that "*Local planning authorities should aim to deal with any undersupply within the first five years of the plan period where possible*". This represents a clear endorsement of the Sedgefield method, which redistributes supply into that same timeframe.

Local Government Association (LGA) and Planning Advisory Service (PAS) guidance

2.7. A report by the LGA and PAS has confirmed that 'the 'Sedgefield approach' is "more closely aligned with the requirements of the NPPF and the need to boost significantly the supply of housing and remedy the unsatisfactory consequences of persistent under delivery".

Planning appeal decisions

2.8. A large number of appeal decisions have endorsed the use of the Sedgefield method, including the following:

APP/H1840/A/12/2171339 (Land between Station Road and Dudley Road, Honeybourne, Worcestershire). In the appeal decision in 2012 the Inspector states in paragraph 36 that: *'it is inconsistent with Planning for Growth and the NPPF paragraph 47 to meet any housing shortfall by spreading it over the whole plan period. Clearly it is better to meet the shortfall sooner rather than later. Moreover, if the buffers are brought forward into the first 5 years as in the NPPF, 36 so also should the shortfall. I cannot agree with the Council's use of the residual method.'*

- **APP/Z3825/A/12/2183078** (Land east of Daux Avenue, Billingshurst, West Sussex RH14 9SZ). In paragraph 41 of the decision in 2013 the Inspector states: *'I come down strongly on the side of*

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adopting the Sedgefield approach. In the first place, and most importantly of all, there is a need to address the housing shortfall as a matter of urgency. To postpone dealing fully with the problem would delay meeting the legitimate aspirations of households and communities to have the homes that they require.'

- **APP/R0335/A/14/2228002** (Land south of The Limes, Hayley Green, Warfield, Berkshire). In Paragraph 35 of the appeal decision (17 June 2015) the Inspector states that: *"The PPG makes clear that local authorities should aim to deal with any under-supply within the first 5 years of the plan period, where possible (the 'Sedgefield' method).'*
- **APP/M1710/A/14/2226723** (Land east of 20-38 Lymington Bottom Road, Medstead, Hampshire GU34 5EW). Paragraphs 22-25 of the appeal decision in this case dated June 2015 make clear that the Sedgefield method should apply in light of government guidance.
- **APP/W0530/A/13/2207961** (Waterbeach, Cambridge). In paragraph 26 of the appeal decision (June 2014) the Inspector states that: *'I consider that the Sedgefield approach aligns more closely with the Government's objective as expressed in paragraph 47 of the Framework [...] This view is consistent with that expressed in the joint Local Government Association and Planning Advisory Service publication [...].'*
- **APP/M1710/W/15/3060919** (Land rear of 131 Winchester Road, Four Marks, Hampshire). In paragraph 20 the inspector states that: *'A number of appeal decisions and judgements have supported the application of either method depending on the circumstances of the case [...]. In the majority of cases where the Liverpool method was applied the size of the strategic allocations was significantly above that of the [appeal site] allocation. This demonstrates that the use of the Liverpool method is mostly reserved for cases where the allocated development sites are so large that they require an allowance of more than five years for delivery.*

- 2.9. The Council presently has an identified shortfall. However, as the Council has not yet published an annual monitoring report for 2014/2015 or 2015/2016, it is not possible to establish its preferred method of shortfall accounting. Whilst this is the case, it is noted that during the South East Plan period, the Council used the Liverpool method, spreading the shortfall across the entire plan period. This may indicate a preference for future use of the Liverpool method. However, Savills believes that the best practice 'Sedgefield' method is most appropriate.

3. Housing Requirement

- 3.1. The South East Plan requirement was set at 855 units for Mid Sussex DC until its revocation in 2013. This was based upon a large scale housing market assessment, but did not represent the Objectively Assessed Housing Needs (OAN) figure that was later required by the introduction of the NPPF in March 2012. In more recent years, the OAN has been assessed through the production of The Housing and Economic Development Needs Assessments (HEDNA), the most recent being published in February 2015 and updated in November 2015.
- 3.2. The November 2015 HEDNA update found that, based on DCLG's Feb 2015 Household Projections and the previous housing needs, the OAN starting figure was 656. To this, 2.3% was added to account for vacant homes in the District which are not contributing to Housing Need. This increased the OAN to 671. Finally, a range of market signals was evaluated and found that the worsening trend required an uplift in the OAN to increase affordability. As such, the final OAN set by the HEDNA update 2015 was 695dpa.
- 3.3. However, the June 2015 version of the emerging District Plan (Chapter 3: Meeting Housing Needs) found that 695 dpa or 13,180 units over the plan period was not sustainable. Instead it found that the District could accommodate sites which amounted to no more than 11,700 during the plan period. However, some of these were found to be unsustainable due to their rural settings, resulting in a maximum figure of 11,050 units or 650dpa to be delivered.
- 3.4. Notwithstanding this, an amendment was made to the Council's target in November 2015 when a focused amendment version of the District Plan was published, resulting in an increase in the target from 650 to 800dpa (13,600). This amendment was based on the findings of the District Plan sustainability appraisal, which found that the tipping point for negative environmental impacts would instead be 800 units. The additional units were made up from the requirement of Mid Sussex to accommodate a proportion of Crawley Borough's unmet needs. As such, this level of housing could be suitably accommodated within the District. It is this approach that Savills has adopted in the assessments.

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4. Unmet Needs of Neighbouring Authorities

- 4.1. The strategic housing context in respect of planned levels of housing represents a challenging situation. In the case of Mid Sussex, there are six neighbouring authorities, which are directly adjacent, whose housing needs may potentially impact upon the District. These are Brighton and Hove, Crawley, Tandridge, Wealden, Lewes and Horsham. Of the six Local Authorities (excluding the South Downs) the total shortfall in meeting the relevant objectively assessed housing needs (OAN) contained in the most recent evidence of housing needs, now stands at 6,645 dwellings over the next five years (or a combined total of 1,328 dpa). This does not account for the unmet needs of London, which are also considerable (of at least 6,400 dpa, with some measures indicating the shortfall at as much as 22,450 dpa).
- 4.2. Only two out of the six neighbouring authorities have more planned housing per annum than the OAN set by the relevant SHMA. A majority of the authorities lack sufficient planned housing to meet the OAN within the SHMA. As a result, the total shortfall in meeting the OAN of the combined area by 6,645 dwellings over the respective plan periods, or 1,107 per the six authorities if divided equally (theoretically).
- 4.3. It is recognised that the proportion of unmet housing needs is far from an exact science. However, whilst it is acknowledged that this would not be required to be met by Mid Sussex in its entirety, it demonstrates the level of unmet housing need within the immediate area.
- 4.4. It should be noted that some OAN figures are presented within the SHMA as a range rather than a single figure and therefore the actual OAN shortfall could be slightly higher or lower than this. Nonetheless, a mid-point figure has been used to calculate the average OAN in the relevant authorities. Table 2 details the level of planned housing within the respective authorities as set out within their development plan, along with the OAN of the relative SHMA.

Table 2: Unmet needs of neighbouring authorities

	A	B	C	D
	Adopted Plan - Planned Housing & Period	Up to date plan*	Up to date OAN or Population Projection where no up to date SHMA*	Difference (A-C)
Brighton and Hove	451 dpa. July 2005 (1991-2013)	No	1050 dpa. (SHMA Apr 2014)	-559 dpa
Crawley	340 dpa. Dec 2015 (2015-2030)	Yes	634 dpa. (SHMA Mar 2015)	-294 dpa
Tandridge	125 dpa. Oct 2008 (2006-2026)	No	470 dpa. (SHMA Sept 2015)	-345 dpa
Wealden	674 dpa. Feb 2013 (2013-2027)	Yes	648 dpa. (SHMA Oct 2015)	26 dpa

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	A	B	C	D
	Adopted Plan - Planned Housing & Period	Up to date plan*	Up to date OAN or Population Projection where no up to date SHMA*	Difference (A-C)
Lewes	230 dpa. Mar 2003 (1991-2011)	No	490 dpa.	-260 dpa
Horsham	800 dpa. Nov 2015 (2011-2031)	Yes	660 dpa.** (SHMA Oct 2012)	140 dpa
Total excl London	2,620 dpa.		2,952 dpa.	-1,328 dpa
London	42,389 dpa. Mar 2016 (2015-2025)	Yes	48,841 dpa (SHMA 2013)	-6,425 dpa
Total incl London	45,009 dpa		51,793 dpa	-7,753 dpa

*Up to date is post March 2012

**Mid-point of OAN range figures within respective SHMA

Population projection based on a blended average of 2008, 2011 and 2012 ONS Population Projections

5. Five Year Land Supply Assessment

- 5.1. The Submission Draft version of the emerging Local Plan originally set an OAN of 650dpa. However, in November 2015, the Council updated the OAN figure to 800dpa in the Focused Amendments District Plan document. The OAN was increased due to the Council's acknowledgement that the unmet needs of Crawley would need to be duly taken into account. This approach is preferred by Savills as it takes a more holistic approach to assessing OAN and acknowledges the actualities of cross-boundary migration.
- 5.2. Due to this uplift, a shortfall had been created against the supply in the first two years of the plan and a method of adjustment would need to be used. As the Council has not yet demonstrated the preferred methodology, the assumption has been made that it would prefer the Liverpool Method due to its historic use of the method (See Section 1). It should be noted that the Council adopted a 20% buffer on top of the housing requirements due to its historic undersupply. Savills agrees within this approach.
- 5.3. As a result of the increased OAN and the assumption made upon the shortfall adjustment method, the supply falls below the five year requirement to **4.15 years** (the use of the Sedgfield method would result in 4.05 years). Nonetheless, the fact that the Council does not have a five year supply is supported by various appeal decisions, including:
- APP/D3830/W/15/3140867 and APP/D3830/W/15/3134454 (Barn Cottage, Ansty), 1 July 2016
 - APP/D3830/W/16/3144084 (64 & 66 Janes Lane, Burgess Hill), 23 June 2016
 - APP/D3830/W/15/3038217 and APP/D3830/W/15/3129329 (Broad Street, Cuckfield), 31 May 2016

Table 3: Five Year Land Supply Scenario 1

Councils Position as of November 2015	
Total Requirement 2016-21	4,000
Shortfall 2014-16	-136
Revised Requirement 2016-21	4,136
Revised Requirement 2016-21 (plus 20%)	4,842
Revised Annual Requirement 2016-21 (plus 20%)	968
Housing Supply 2016-21	4,022
Years Supply (20% Buffer)	4.15

- 5.4. Savills has adopted the same approach to the OAN as well as applying a 10% non-implementation rate to projected completion rates. This reflects the likelihood that not every consented dwelling will be delivered. In addition, Savills is in agreement with the Council with regards to the use of the 20% buffer.
- 5.5. However, in the case of an increased OAN, the first two years of the plan (2014/2016) would create a shortfall of 271 units. As such, the Savills analysis requires a method of shortfall adjustment. As stated in Section 1, the best practice Sedgfield method should be used to ensure that the cumulative shortfall

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from the beginning of the plan is dealt with within the current five year period. This method results in a supply of just **3.65 years**.

Table 4: Five Year Land Supply Scenario 2

Savills Position	
Total Requirement 2016-21	4,000
Shortfall 2014-16	-136
Revised Requirement 2016-21	4,136
Revised Requirement 2016-21 (plus 20%)	4,962
Revised Annual Requirement 2016-21 (plus 20%)	992
Housing Supply 2016-21	4,022
Housing supply 2016-21 (minus 10% non-implementation discount)	3,620
Years Supply (20% Buffer)	3.65

5.6. However, the introduction of the application at Pease Pottage helps to reduce this shortfall in housing supply. At present, the trajectory for delivery of the scheme is as follows:

- 16/17 – Planning process including Phase 1 Reserved Matters
- 17/18 – Discharge of Conditions – 50 units delivered
- 18/19 – 100 units and delivery of Primary School
- 19/20 – 150 units – Care facility delivered (first 24 beds) and associated facilities (shop/cafe)
- 20/21 – 150 units
- 21/22 – 100 units
- 22/23 – 50 units

5.7. Whilst a 10% non-implementation rate should still be used, the scheme at Pease Pottage helps to boost the 3.65 years worth of supply to **4.06** during the current five year period.

Table 5: Five Year Land Supply Scenario 3

Savills Position plus Pease Pottage Delivery	
Total Requirement 2016-21	4,000
Shortfall 2014-16	- 136
Revised Requirement 2016-21	4,136
Revised Requirement 2016-21 (plus 20%)	4,962
Revised Annual Requirement 2016-21 (plus 20%)	992
Housing Supply 2016-21	4,472
Housing supply 2016-21 (minus 10% non-implementation discount)	4,025
Years Supply (20% Buffer)	4.06

6. Conclusions

- 6.1. The purpose of this report is to assess the five year land supply position of Mid Sussex District Council. This assessment is produced to support the planning application at Land East of Brighton Road, Pease Pottage.
- 6.2. There is a severe shortfall of available housing sites in Mid Sussex, resulting in an absence of five year housing land supply (5YHLS) by a considerable margin. It is understood that Mid Sussex District Council shares the view that it cannot demonstrate a 5YHLS. There is a clear precedent of recent appeal decisions (in 2016) indicating that Mid Sussex cannot demonstrate a 5YHLS.
- 6.3. Both Savills and the Council are in agreement that there is a history of persistent under delivery and therefore a 20% buffer is appropriate, in line with the requirements of the NPPF. Housing delivery has not met the requirement for eight of the past 10 years. Based on a reasonable non implementation rate (of 10%) and utilising the well recognised 'Sedgefield' method, it is considered that the best case scenario for the 5YHLS of Mid Sussex is in the order of **3.65 years**. This is a best case scenario as Savills has not scrutinised the delivery expectations of Mid Sussex DC in this assessment and therefore relied upon the Council's own forecasting. However, should there be difficulty in delivering all forecasted units or the Council's assumptions challenged, the 5YLS figure would fall below 3.65 years.
- 6.4. The strategic housing context in respect of planned levels of housing represents a challenging situation. Of the six Local Authorities adjacent to Mid Sussex (excluding the South Downs), the total shortfall in meeting the relevant objectively assessed housing needs (OAN) contained in the most recent evidence of housing needs, now stands at 6,645 dwellings over the next five years (or a combined total of 1,329 dpa). This does not account for the unmet needs of London, which are also considerable (of at least 6,450 dpa, with some measures indicating the shortfall at as much as 22,450 dpa).
- 6.5. The proposed housing requirement for Mid Sussex is 800 dpa, increased to reflect a proportion of the unmet housing needs of Crawley, which is well related to the development proposal at Pease Pottage. There is recognition of the relevance of unmet housing needs by Mid Sussex District. The housing requirement of 800 dpa has been used in this assessment, and given the wider strategic housing context must be seen as a minima provision.
- 6.6. The delivery of housing at Pease Pottage in the period 2016-2021 has the potential to increase the 5YHLS by 10%, improving the situation to circa **4.06 years** of supply.

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Appendix 1 Trajectory Scenarios

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MID SUSSEX BOROUGH HOUSING TRAJECTORY - COUNCIL'S APPROACH (November 2015)

Based upon a housing requirement incorporating the housing shortfall between 2014 and 2016 (with account for delivery 2006-2014).

Assessed Housing Need based on housing target within emerging Local Plan (Mid Sussex District Plan 2014-2031 - Focused Amendments Version).

Projected completions based emerging District Plan Housing Trajectory (Appendix A)

20 % buffer applied to requirement and shortfall

[illegible]

MID SUSSEX BOROUGH HOUSING TRAJECTORY - SAVILLS APPROACH

Based upon a housing requirement incorporating the housing shortfall between 2014 and 2016 (with account for delivery 2006-2014).

Assessed Housing Need based on OAN in November 2015 HEDNA Update

Projected completions based emerging District Plan Housing Trajectory (Appendix A)

20% buffer applied to requirement and shortfall

	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
New Homes (net completions)	337	502	480	353	179	522	749	536	630	868															
Projected New Homes (net completions)											770	811	842	842	667	667	667	667	667	520	520	520	520	520	520
Windfall Allowance																45	45	45	45	45	45	45	45	45	45
Total Project New Homes (net completions)											693	730	758	798	641	45	45	45	45	45	45	45	45	45	45
South East Plan Target*	855	855	855	855	855	855	855	855	800	800	800	800	800	800	800	800	800	800	800	800	800	800	800	800	800
Focused Amendments District Plan 2015									800	800	27	27	27	27	27	800	800	800	800	800	800	800	800	800	800
2014-2016 Shortfall Adjustment (Sedgefield Method)										34	992	992	992	992	992										
2015-2021 Revised Housing Requirement - 20% NPFF Buffer										1001															
Performance against SEP/Assessed Housing Need	-518	-353	-375	-502	-676	-333	-106	6	-170	34	-30	11	42	42	-133										
Cumulative Performance	-518	-871	-1246	-1748	-2424	-2757	-2863	-2857	-170	-136	-166	-155	-113	-71	-204										
2013/14 target from Housing Implementation Strategy (July 2013)																									
FIVE YEAR HOUSING LAND SUPPLY																									
2016-2021																									
Five Year Housing Land Supply 2016-2021 20% Buffer**											3.65	3.69	3.69	3.63	3.23										
*Forward projections account for no allowance of historic shortfall in following five year periods																									



	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31
New Homes (net completions)	337	502	480	353	179	522	749	536	630	868	770	811	842	842	667	667	667	667	667	667	520	520	520	520	520
Projected New Homes (net completions)																									
Plus Pease Potage																									
Windfall Allowance																									
Total Project New Homes (net completions)	855	855	855	855	855	855	855	530																	
South East Plan Target*																									
Focused Amendments District Plan 2015																									
2016-2020 Shortfall Adjustment (Sustainable Method)																									
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2016-2020																									

Mid Sussex Five Year Housing Land Supply Report

Land East of Brighton Road, Pease Pottage



Charles Collins
Director

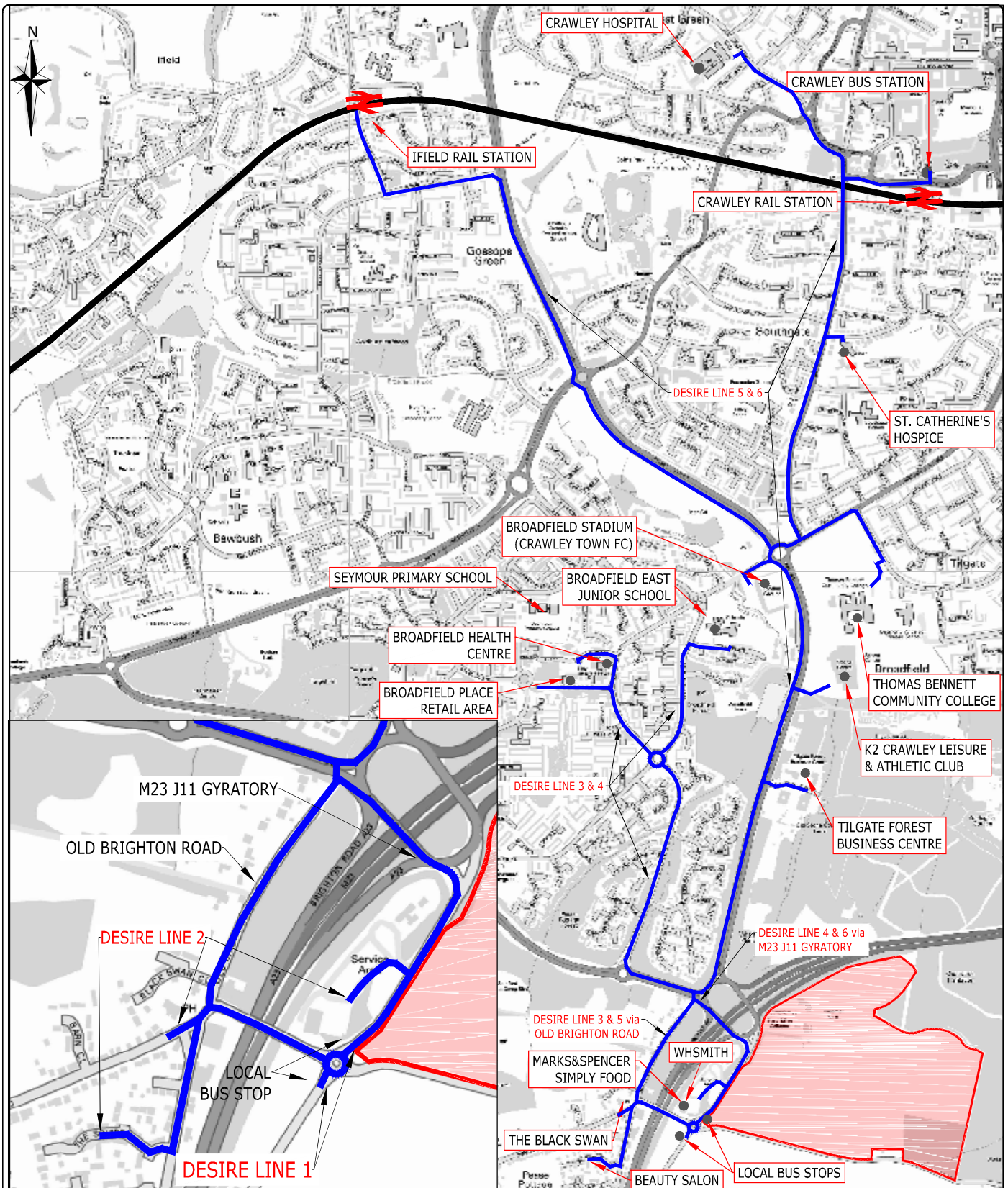
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Appendix 3 - Figure 1A Key Desire Lines

(From Thakeham's application at Pease Pottage, ref DM/15/4711)



ISSUED FOR
INFORMATION ONLY



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PROJECT TITLE:
LAND EAST OF BRIGHTON ROAD, PEASE POTPAGE

DRAWING TITLE:
KEY DESIRE LINES

CLIENT:
THAKEHAM HOMES

SCALE:

NTS

DATE:

19/04/16

DESIGNED:

RF

DRAWN:

RF

CHECKED:

SJH

APPROVED:

ML

DRAWING NO.

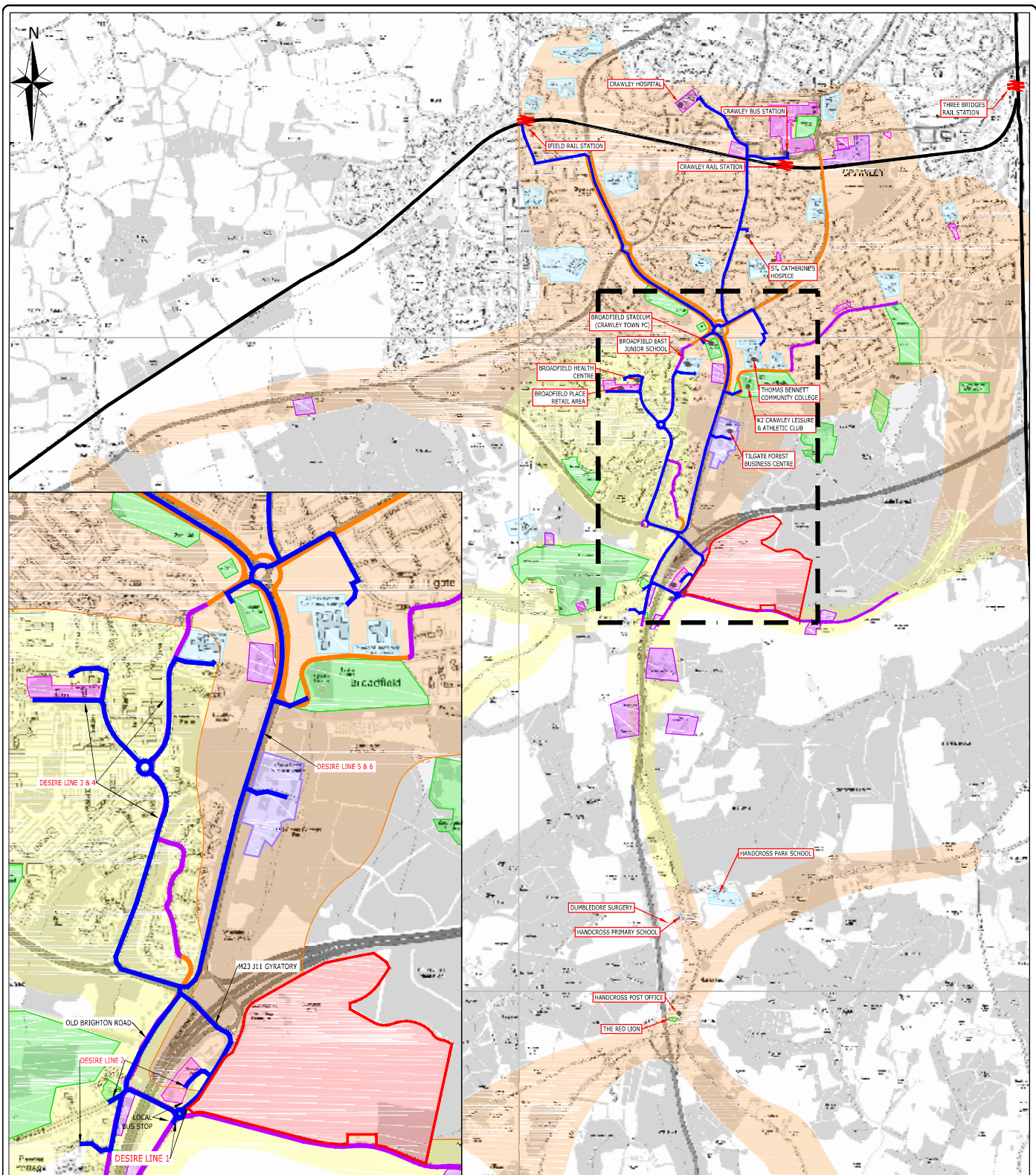
W990 - FIGURE 1A

REV

-

Appendix 4 - Figure 1B cycle routes and desire lines

(From Thakeham's application at Pease Pottage, ref DM/15/4711)



KEY					
	3KM CYCLE ISOCHRONES BOUNDARY		RETAIL		NMU KEY DESIRE LINE
	6KM CYCLE ISOCHRONES BOUNDARY		LEISURE/COMMUNITY		ON-ROAD CYCLE ROUTE
	SITE BOUNDARY		EMPLOYMENT		TRAFFIC FREE CYCLE ROUTE
	RAIL STATION		EDUCATION		



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PROJECT TITLE:
LAND EAST OF BRIGHTON ROAD, PEASE POTTAGE

DRAWING TITLE:
CYCLE ROUTES & DESIRE LINES

CLIENT:
THAKEHAM HOMES

SCALE:
NTS@A3

DATE:
19/04/16

DESIGNED:
RF

DRAWN:
RF

CHECKED:
SJH

APPROVED:
ML

DRAWING NO.

W990 - 1B

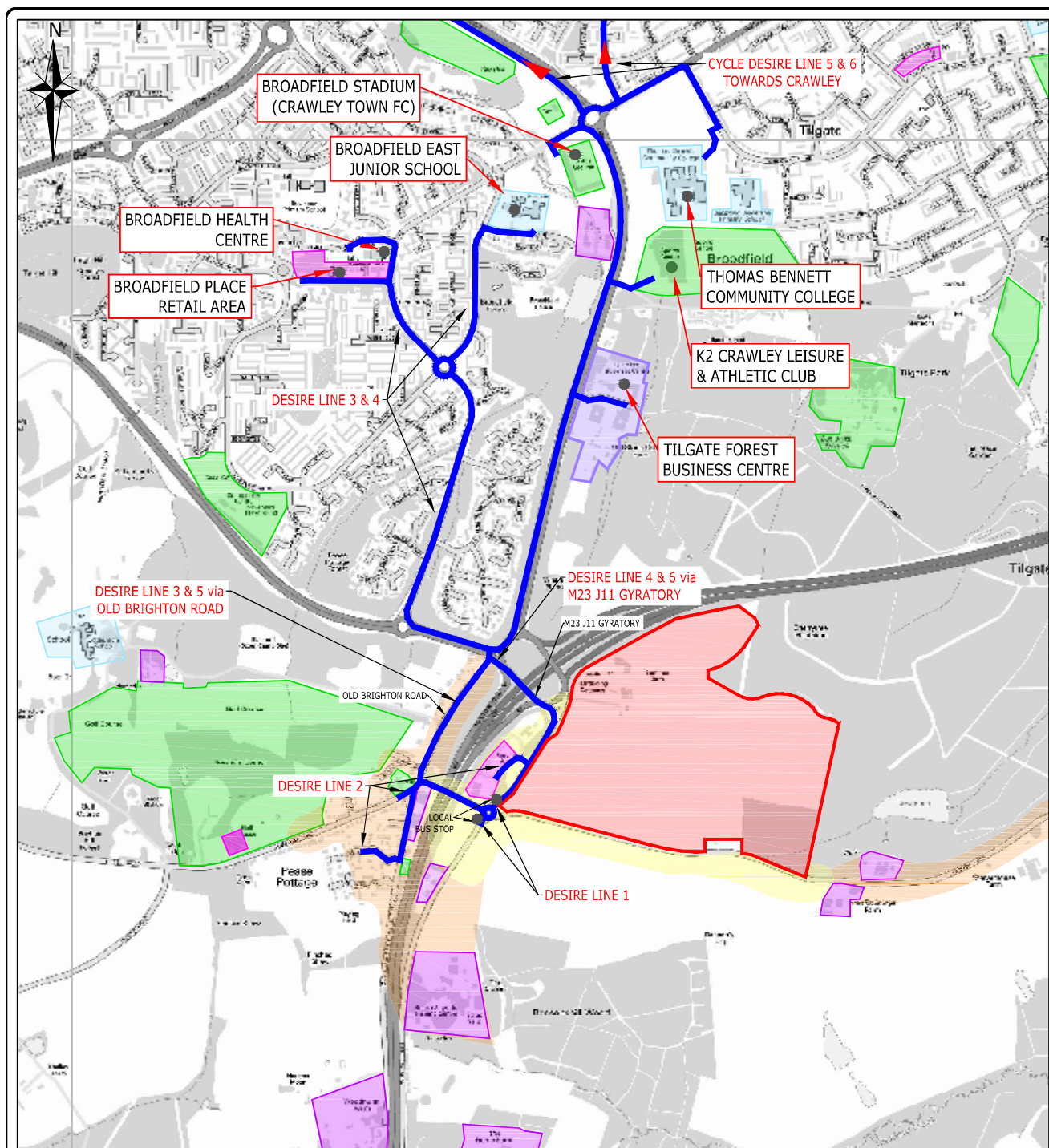
REV

-

Appendix 5 –

Figure 1C PED DESIRELINE & WALKING ISOCHRONES

(From Thakeham's application at Pease Pottage, ref DM/15/4711)



KEY

- 800m WALK ISOCHRONE BOUNDARY (15 MINUTE WALK AT 53m/MIN)
- 1200m WALK ISOCHRONE BOUNDARY (15 MINUTE WALK AT 80m/MIN)
- SITE BOUNDARY
- NMU KEY DESIRE LINE

- RETAIL
- LEISURE/COMMUNITY
- EMPLOYMENT
- EDUCATION
- RAIL STATION

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PROJECT TITLE:
LAND EAST OF BRIGHTON ROAD, PEASE POTTAGE

DRAWING TITLE:
PEDESTRIAN DESIRE LINES

CLIENT:
THAKEHAM HOMES

SCALE:
NTS@A4

DATE:
19/04/16

DESIGNED:
RF

DRAWN:
RF

CHECKED:
SJH

APPROVED:
ML

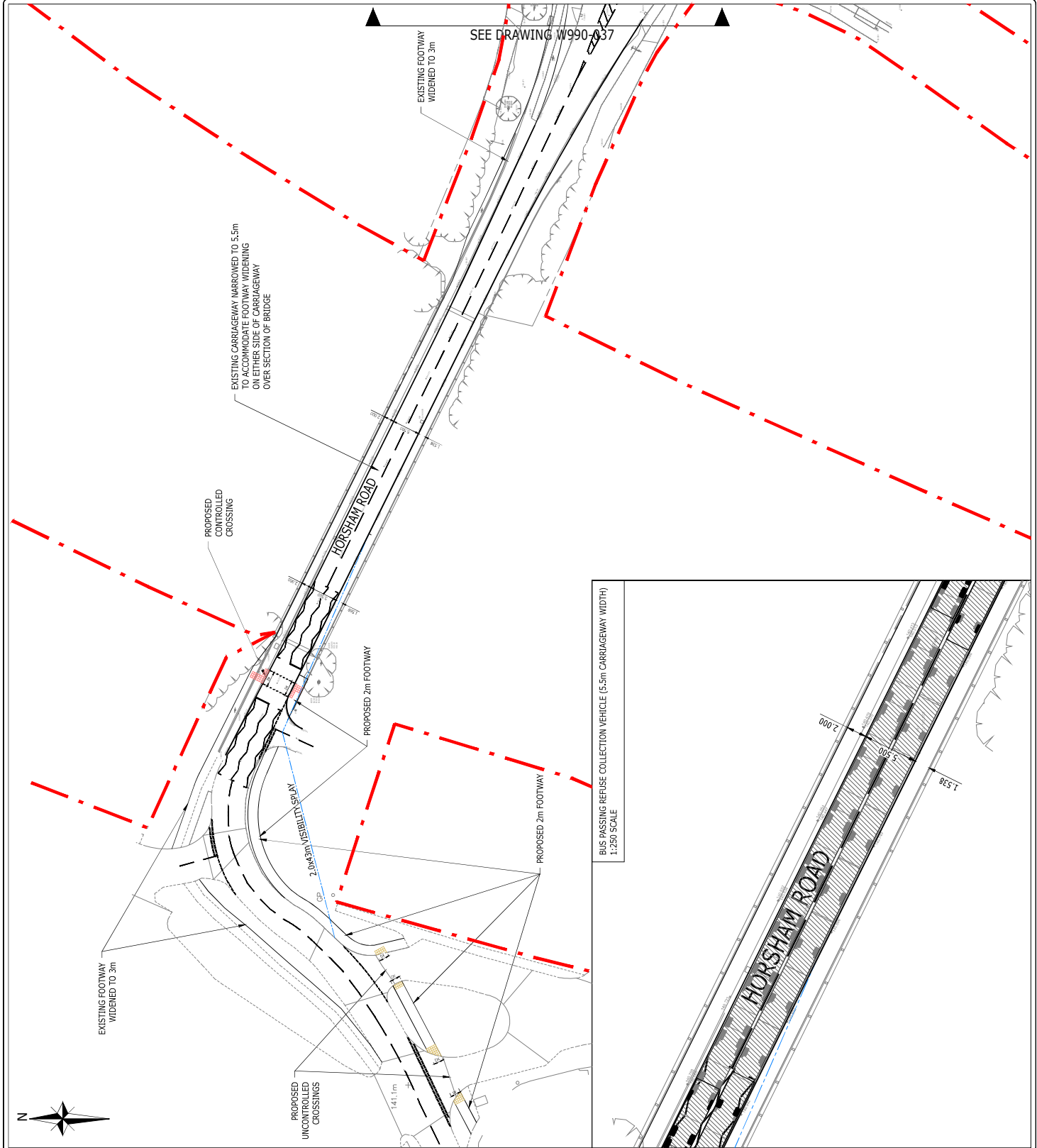
DRAWING NO.

W990 - 1C

REV
-

Appendix 6 - W990-007B Horsham Rd Footways

(From Thakeham's application at Pease Pottage, ref DM/15/4711)



NOTES:

KEY

--- EXTENT OF HIGHWAY BOUNDARY

Large Refuse Vehicle (3 axle)

Overall Length 9.450m
Overall Width 3.250m
Overall Height 2.450m
Min Body Ground Clearance 0.765m
Min Wheel Ground Clearance 0.105m
Lock to Lock Time 4.005m
Kerb to Kerb Turning Radius 9.550m

Single Deck Bus

Overall Length 11.980m
Overall Width 2.440m
Overall Height 2.740m
Min Body Ground Clearance 0.765m
Min Wheel Ground Clearance 0.105m
Lock to Lock Time 6.005m
Kerb to Kerb Turning Radius 10.388m

B CARRIAGEWAY WIDTH CHANGED TO 5.5m DUE TO VISIBILITY

REV	DATE	BY	CHK	APP	DATE
1	01/11/15	KT	CB	SN	01/11/15
2	05/12/15	KT	DV	HL	05/12/15

A TOPIC ADDED

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PROJECT TITLE: LAND EAST OF BRIGHTON ROAD, PEASE POTAGE

DRAWING TITLE: PROPOSED FOOTWAY IMPROVEMENTS ON HORSHAM ROAD

SCALE: 1:500 @ A2

DATE: OCTOBER 2015

DRAWN: KT

CHECKED: SJH

DESIGNED: KI

APPROVED: ML

DRAWING NO: W990-007

REV: B

Appendix 7 - W990-037B Proposed Site Access Junctions

(From Thakeham's application at Pease Pottage, ref DM/15/4711)

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