

MID SUSSEX DISTRICT PLAN EXAMINATION

Housing Matters Statement

on behalf of Gleeson Developments Ltd

November 2016

Mid Sussex District Plan
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1. Evidence base

1.1 Do the West Sussex SHMA (2009), the Northern West Sussex SHMA (2012), the Housing and Economic Development Needs Assessment (HEDNA) (February 2015), the HEDNA Update (November 2015) and the HEDNA Addendum (June 2016) constitute an adequate evidence basis for the assessment of the District's Objectively Assessed Housing Need (OAN)?

1.1.1. No.

1.1.2. As set out within our representations to the Pre Submission District Plan and the Focused Amendments to the District Plan, Gleeson Developments Ltd remains fundamentally concerned that the evidence base underpinning the District Plan has repeatedly failed to robustly assess, in accordance the National Planning Policy Framework ("NPPF") (namely paragraphs 47 and 159), the OAN for Mid Sussex.

1.1.3. The Council has not followed the correct approach to assess and determine a reliable OAN. The PPG emphasises (ID: 2a-004) that:

'the assessment of development needs is an objective assessment of need based on facts and unbiased evidence. Plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints. However, these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans'.

1.1.4. This requirement for a 2-stage process (first identifying OAN ('policy off') and then determining whether and to what extent it can be met in full ('policy on') have been established through the Courts, including the Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited [2014] EWCA Civ 1610 which held that:

"The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy's methodology was essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. [...] The two-step approach is by no means barren or technical. It means that housing need is clearly

and cleanly ascertained. And as the judge said at paragraph 94, “[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies” (paragraph 16).

- 1.1.5. The approach followed by Mid Sussex does not follow this two-stage process and is unsound having regard to the NPPF paragraph 182 soundness tests. To address these failings, the Council must re-visit its housing numbers / strategy as part of this Examination process via a suitable delay and the publication of Main Modifications.
- 1.1.6. Analysis of OAN for Mid Sussex was undertaken within our representations to the Pre Submission District Plan. This analysis was underpinned by the (at that time up to date) 2012-based population and household projections. However, given the passage of time since this consultation, the 2014-based population and household projections have been subsequently released which supersede the 2012-based projections.
- 1.1.7. In the light of updated OAN work commissioned by the Developer Forum (of which our client is a member), we have not sought to update our previous analysis as this would unnecessarily duplicate the work undertaken on behalf of the Forum. However, having reviewed the up to date OAN analysis undertaken by both Barton Willmore and NLP (appended to the Developer Forum Statement) we agree with the overall conclusions that OAN for Mid Sussex, prior to assisting in meeting the unmet needs from neighbouring authorities (most notably Brighton & Hove and Crawley), is at least 1,000 dwellings per annum (“dpa”).

2. Calculation of the OAN

With regard to **Questions 2.1 to 2.3** please refer to our response to Housing Matter 1 above, and to the Development Forum statement to Housing Matter 2.

3. The Duty to Co-operate

3.1 Can it be demonstrated that active co-operation has taken place on strategic cross boundary issues, especially in respect of the assessment of wider and unmet housing need?

3.1.1 This is a matter for the Council.

4. Unmet need

4.1 What factors should determine the amount of provision that should be made in Mid Sussex to accommodate the unmet needs of other authorities, notably Brighton and Hove, and Crawley?

4.1.1 Gleeson Developments Ltd supports the conclusions reached in the analysis submitted by the Developer Forum as part of its Statement i.e. that unmet needs from Brighton & Hove and Crawley exist; and that there are clear travel to work and / or in-migration patterns to Mid Sussex from these neighbouring authorities which demonstrate that a reasonable proportion of existing unmet needs should be met within Mid Sussex. Based on relevant technical work, the Developer Forum concludes that a reasonable proportion of these unmet needs to be accommodated within Mid Sussex is between 236 and 430 dwellings per annum (in addition to the District-specific OAN calculation of a minimum of 1,000 dpa).

4.2 What calculations have taken place on a cross-boundary basis to arrive at that provision?

4.2.1 We are not aware of any evidence published by the Council which sets out how cross boundary unmet housings needs from Crawley and Brighton & Hove have been apportioned and, instead, it seems simply to have been treated as a residual figure that goes up or down within an overall 'cap' on development in the District of 800dpa.

4.2.2 As referenced previously, as part of the correct two-stage process, the starting point should be recognition of the relevant unmet needs, followed by analysis of whether these needs, in part or full, can be accommodated in sustainable locations. Only having identified these, and therefore full OAN for the District, should the second stage of the process be engaged i.e. to what extent can full OAN be accommodated.

5. Affordable housing

5.1 Will the housing requirement be sufficient to ensure that the District's affordable housing needs are met?

5.1.1 No.

5.1.2 As set out within our response to Housing Matter 1 above, the Developer Forum commissioned both NLP and Barton Willmore to undertake independent assessments of market and affordable housing needs in Mid Sussex. Gleeson Developments Ltd supports the conclusions that the need for affordable housing within Mid Sussex is between 371 and 474 affordable homes per annum. Based on 30% affordable housing delivery through market-led housing development (in accordance with Policy DP29 of the emerging District Plan), a housing requirement of between 1,236 and 1,580 dwellings per annum is required for the District to meet affordable needs in full.

6. The ability of the market to deliver

6.1 Can the market deliver the requirement set out in the submitted plan? What would be the implications of a higher housing requirement for market deliverability?

6.1.1 Gleeson Developments Ltd endorses the conclusions reached within the market delivery analysis submitted as part of the Developer Forum Statement to Housing Matter 6 that market capacity should not be considered a constraint to delivering at least 1,000dpa within Mid Sussex over the District Plan period.

7. Past under-delivery

7.1 Should the housing requirement be adjusted to compensate for a degree of under-provision against the South East Plan prior to 2014?

7.1.1 Yes. Gleeson Developments Ltd agree with the position set out within the Development Forum Statement to Matter 7.

8. Site selection and housing distribution

8.1 Are the methodologies described in the Strategic Site Selection Paper and the SHLAA sound?

SHLAA

- 8.1.1 Whilst the overarching SHLAA methodology broadly follows the approach set out within the PPG, as set out within our representations to the Pre Submission District Plan and the Focused Amendments to the District Plan, Gleeson Developments Ltd considers that the assessment process is fundamentally flawed, as it is demonstrably the case that the SHLAA concludes that sites are unsuitable for housing development which the Council itself has subsequently concluded, through the planning application process, are suitable for such development. This is also a concern endorsed in the Statement produced by the Development Forum.
- 8.1.2 To illustrate this point, Gleeson Developments Ltd has a site immediately adjacent to the Category 2 Settlement of Crawley Down in Worth Parish (SHLAA Site Ref: 281). The SHLAA identifies this site as 'Not Currently Developable'. However, in April 2016 the Council resolved to approve a planning application for the construction of 60 homes on this same site. This clearly demonstrates the deficiencies of the conclusions of the SHLAA which, wrongly, concludes that there is a lack of suitable sites for development in the District. We are aware that there are other examples both at Crawley Down and elsewhere and the submission by the Developer Forum demonstrates very clearly that, contrary to the conclusions of the SHLAA, there is a very significant quantum of land that is available and suitable for development that could be allocated to increase housing provision in the District.
- 8.1.3 Against this background, as set out in detail within our representations to the Focused Amendments to the Pre Submission District Plan and our response below to Housing Matter 8.4, the allocation of the Pease Pottage site (SHLAA Site 666) is wholly unnecessary and inappropriate development within the AONB, and contrary to the provisions of the NPPF. Indeed, the SHLAA itself concludes that this site:

“..is entirely within the High Weald AONB and careful consideration would be required to the layout and design to mitigate impact on the features of the AONB. Poorly related to existing settlement and services required to support

development, although there is potential for the provision of some services within the development”.

Strategic Site Selection Paper

- 8.1.4 Whilst we accept that there is no set definition of a ‘strategic site’ within national policy or guidance, Gleeson Developments Ltd considers that the application within the Strategic Site Selection Paper (“SSSP”) of a 500 dwelling threshold for identifying strategic sites is demonstrably flawed and has resulted in the failure to allocate suitable smaller deliverable sites, and the allocation of a wholly inappropriate major development in the AONB.
- 8.1.5 The Council’s rationale for a 500 dwelling threshold, as set out in the SSSP appears, in part, to be based on the potential to deliver on-site infrastructure (paragraph 1.13). However, through Section 106 contributions and CIL the level of infrastructure contributions from two sites of 250 dwellings, or 5 sites of 100 homes, and a single 500 dwelling site, are broadly going to be the same. In any event, based on a range of urban design research publications (Shaping Neighbourhood; Urban Design Compendium; Urban Task Force Report; and Approaching Urban Design) the critical mass necessary to viably support and sustain the delivery of new local shops, primary schools etc... is circa 1,350 dwellings (See **Appendix 1**) – a level significantly greater than the 500 dwelling threshold at which the Council asserts delivers new education/health/retail/ community facilities on site (paragraph 1.13).
- 8.1.6 Gleeson Developments Ltd is firmly of the view that the Council’s failure to allocate a larger number of smaller sites at the District’s most sustainable settlements, has undermined the soundness and deliverability of the housing strategy as a whole and, fundamentally, resulted in the proposed allocation of a wholly unnecessary and inappropriate strategic site within the AONB.
- 8.1.7 In respect of the proposed allocation of the site at Pease Pottage, in the AONB, the methodology within the SSSP Paper demonstrates that contrary to the NPPF (paragraph 115) great weight has not been given to conserving the AONB. We note, for example, that the assessment criteria used applies the same ‘very negative impact’ score to sites entirely within the AONB as it does for sites where ownership details are unclear, or which may take more than 6 years to deliver housing. This clearly does not give appropriate weight the national policy constraint that exists within an AONB.

8.1.8 Given the above, Gleeson Developments Ltd considers that the methodology and conclusions reached within the SHLAA and SSSP fail the NPPF paragraph 182 soundness tests.

8.2 Is there any value in the concept of ‘environmental capacity’ and the ‘tipping point’ in the context of the whole district? What would the environmental implications be of raising the housing requirement? How far have the SHLAA and site selection methodologies taken into account the ability of development impacts to be mitigated through local landscape and infrastructure measures?

8.2.1 The District Plan Focused Amendments (paragraph 3.17) asserts that the provision of 800dpa is the *‘maximum plan provision figure that could be delivered sustainably in Mid Sussex.’* This is demonstrably not the case and is a conclusion based on a fundamentally flawed application of relevant national policy.

8.2.2 Section 7 of the District Plan Sustainability Appraisal (“SA”) (November 2015) considers the issues of OAN and housing provision. It concludes that Option C (800dpa) (page 91) is the *‘tipping point’* between acceptability and unacceptability when:

“...weighing up whether positive impacts on social and economic objectives outweigh any negative impacts on the environment.”

8.2.3 However, this balance wholly misapplies national policy guidance in the NPPF and as a result, fails to give appropriate weight to the importance of boosting significantly the supply of housing and meeting OAN (calculated reasonably) in full.

8.2.4 The NPPF (paragraph 14) states that for plan-making, the presumption in favour of sustainable development means that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. The only basis for not meeting OAN in full is where a local planning authority can demonstrate that:

- (i) the adverse impact of doing so would significantly and demonstrably outweigh the benefits; or
- (ii) specific policies in the Framework indicate that development should be restricted (these policies, as clarified by footnote 9, relate to nationally-protected environments such as Green Belt, AONB and National Parks).

- 8.2.5 We accept that Mid Sussex District does contain areas of AONB in the northern part of the District, and a small area of the South Downs National Park in the south. However, the Council does not (rightly in our view) advance the case that it simply cannot deliver a higher level of housing than 800dpa in locations outside these nationally protected areas (indeed it is now, inexplicably, proposing a strategic allocation within the AONB).
- 8.2.6 Instead, as set out within the SA, the Council's position is that the figure of 800dpa has been selected as this is the *'tipping point'* at which it considers that the negative impacts outweigh the positive impacts.
- 8.2.7 However, as can be clearly seen from paragraph 14 of the NPPF, the appropriate *'tipping point'* is not where adverse impacts outweigh the benefits, but where adverse impacts significantly and demonstrably outweigh the benefits. This is a very different (and deliberately so) planning balance. It is therefore evident that the Council's case, and the District Plan's approach to housing, is based on a 'tipping point' which does not accord with the provisions of the NPPF or recognise the importance of meeting OAN (calculated reasonably) in full. Logic dictates, on the Council's own case, that application of an NPPF compliant *'tipping point'* would result in an ability to accommodate a materially higher level of housing than that identified in the District Plan.
- 8.2.8 On this basis, the housing requirement identified by the Council does not comply with national policy as is unsound.
- 8.2.9 In addition to the above, Gleeson Developments Ltd also support the views set out within the Developer Forum's statement to Housing Matter 8.2.

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?

- 8.3.1 As set out in detail within our representations to the Pre Submission District Plan and the Focused Amendments to the District Plan, deferring the apportionment and allocation of a significant proportion of the District's housing requirement over the period 2014 -2031 to neighbourhood plans or other appropriate planning documents is too vague and fails to provide towns and parishes preparing neighbourhood plans with sufficient and suitable

guidance on the level of housing they should be accommodating, having regard to the sustainability of the District generally. This lack of clarity and guidance is now manifestly resulting in under-provision of housing across the District.

8.3.2 As an example, Crawley Down is a sustainable settlement (identified as a Category 2 Settlement in Policy DP6 of the District Plan) and Figure 4 of the District Plan confirms that with the exception of being just within 7km of the SPA (which the Council accepts can be mitigated), it is unconstrained. However, without guidance in the District Plan as to the scale of development that should be accommodated at Crawley Down, the 'made' Crawley Down Neighbourhood Plan (2016) does not allocate any sites for housing, despite a number of sites being identified as available for residential development.

8.3.3 Cuckfield and Hurstpierpoint (also Category 2 Settlements) have similarly allocated just 28 dwellings and 40 dwellings respectively in their neighbourhood plans. As such, three of the five Category 2 Settlements identified by the Council have collectively allocated only 68 dwellings towards the identified District Plan residual target of 2,262 dwellings. This also demonstrably falls well short of the need identified in the Council's HEDNA Update November 2015.

8.3.4 Conversely, significantly less sustainable settlements such as Turner Hill / West Hoathly (Category 3 Settlements) and Twineham (a Category 4 Settlement) propose to allocate 99 homes and 20 homes respectively.

8.3.5 In the absence of such spatial strategy guidance, the District Plan as currently drafted is ineffective and as demonstrated above is resulting not only in an under-provision of housing generally, but also an increasingly unsustainable pattern of development that is contrary to the Sustainability Appraisal preferred option and the District Plan's overarching vision and spatial strategy. Consequently, the District Plan is unsound as it is not justified or effective.

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?

8.4.1 As set out in detail within our representations to Policy DP9a of the Pre Submission District Plan Focused Amendments, the allocation of the Pease Pottage site for 600 dwellings cannot be reconciled with the SA and SHLAA findings. Furthermore, and even more fundamentally, the proposed allocation of this site can similarly not be reconciled with guidance in the NPPF, namely paragraphs 14 (footnote 9), 115 and 116.

Development in the AONB

- 8.4.2 The proposed allocation involves wholly unnecessary and inappropriate major development on land within the AONB, contrary to the provisions of the NPPF. As set out within Appendix 1 of Housing Matter 8 to the Developer Forum Statement, active developers in the District have currently unallocated sites that are available for development, in sustainable locations, sufficient to accommodate an additional 5,000 dwellings. These omission sites are all on land that is outside the AONB and must, having regard to paragraph 115 of the NPPF, be released for development ahead of highly sensitive and nationally constrained sites within the AONB, such as that at Pease Pottage.
- 8.4.3 We are unclear as to the evidence on which the Council relies to justify this proposed allocation, and it seems to broadly rely on that submitted by the promoters of that site as part of a demonstrably premature planning application for the site (Reference DM/15/4706). It can be noted that this application is the subject of significant outstanding objection from Natural England and the High Weald AONB Unit (amongst others).
- 8.4.4 As set out in detail within our representations to Policy DP9 40% of the District, the broad area between Hassocks and Haywards Heath, and to the north of Turner Hill, falls within neither the AONB or South Downs National Park. Importantly, within these areas that are unconstrained by national policy designations, are a range of significant and sustainable settlements which include:
- Haywards Heath (Category 1 Settlement)
Burgess Hill (Category 1 Settlement)
Hassocks (Category 2 Settlement)
Crawley Down (Category 2 Settlement)
Cophorne (Category 2 Settlement).
- 8.4.5 Accordingly, it is evident that had the SHLAA been undertaken properly, there are a variety of sustainable locations, which are not affected by AONB or National Park designations, which are surrounded by deliverable and developable land suitable for housing. As such it is impossible to see that any circumstances exist to justify the allocation of the Pease Pottage site, let alone the exceptions circumstances (and public interest) required by the NPPF (paragraph 116). This fundamental national policy conflict alone requires the deletion of this allocation.

Proximity to Crawley

- 8.4.6 The Council seems to assert that Pease Pottage is the only settlement that is well related to Crawley and, therefore, able to address (to an extent) some of the unmet needs from Crawley. However, this is wholly flawed. There are a variety of other settlements in close proximity to Crawley, most notably Crawley Down and Copthorne, which are both higher up in the settlement hierarchy than Pease Pottage and which are not within the AONB.
- 8.4.7 For example, the settlements of Crawley Down and Copthorne are both Category 2 Settlements, which the Council's Settlement Sustainability Review May 2015 identifies as meeting all of the criteria as Local Service Centres i.e. providing a range of retail uses, school facilities, significant local employment opportunities within 5km, a village hall, a health centre and good provision of recreational facilities.
- 8.4.8 In comparison, the site allocated at Pease Pottage is located entirely within the AONB and Pease Pottage is a Category 3 settlement which the Council's Settlement Sustainability review May 2105 identifies as having only "...a shop based at the nearby service station and a public house". Indeed, the SHLAA concludes for Site Reference 666 (the Pease Pottage allocation) that the site is:

"... Poorly related to existing settlement and services required to support development, although there is potential for the provision of some services within the development".

- 8.4.9 As an example, Crawley Down and Copthorne are both settlements significantly less constrained than Pease Pottage, and on the Council's own evidence, more sustainable. In these circumstances the proposed allocation of 600 homes on the site at Pease Pottage is irrational, unjustified and unsound. We have addressed previously the flawed logic associated with the Council's imposition of a 500 home threshold for strategic site allocations.

Strategic Site Selection Process

- 8.4.10 As previously referred to within our statement to Housing Matter 8.1 there is no national policy or guidance justifying the consideration only of sites of more than 500 dwellings. Gleeson Developments Ltd is firmly of the view that the Council failure to allocate a larger number of smaller strategic / non-strategic sites adjacent to the District's sustainable

settlements has resulted not only in a strategy that does not deliver sufficient housing overall, or a 5 year land supply, but in the allocation of a wholly unnecessary and inappropriate strategic site within the AONB.

Sustainability Appraisal (SA)

- 8.4.11 In selecting locations for development, the Council's SA firstly assesses broad locations for strategic development (pages 95 to 99). This concludes that locations around Burgess Hill, East Grinstead, Haywards Heath and South of Crawley (Pease Pottage) are the most sustainable. Whilst we would not in any way dispute this conclusion in relation to the three main towns in the District, the inclusion of South of Crawley (Pease Pottage) is somewhat surprising. The overall conclusion confirms that the rationale for the selection of South of Crawley (Pease Pottage) is that it would provide housing close to Crawley where there are unmet needs, and that it would provide a workforce close to the main employment areas (presumably Crawley in the context of Pease Pottage). The SA conclusion notes that *"All options generally impact negatively on environmental objectives as all propose strategic development in countryside locations"* but states that this *"...is to be expected"*.
- 8.4.12 Unfortunately, these conclusions seem to be post-justification of a decision to allocate the Pease Pottage site rather than an objective Sustainability Appraisal.
- 8.4.13 By way of example, it is quite clear that development at either Crawley Down (Option F) or Copthorne (Option E) would also fulfil the criteria to provide a workforce close to the main employment area and to provide housing close to where need arises i.e. from Crawley. As such, why these options score less well than South of Crawley (Pease Pottage) is wholly unclear and in any event unjustified.
- 8.4.14 Of even greater concern is the fact that the SA seems almost to ignore the fact that the South of Crawley (Pease Pottage) option is located in the AONB and, therefore, benefits from national level policy protection from major development. To seek to equate this with all of the other options, even where they are outside the AONB and have no such restrictions, is at best wholly incorrect and at worse deliberately misleading.
- 8.4.15 The proposed allocation of the strategic site at Pease Pottage is wholly unsound and must be deleted. The only point at which consideration should be given to the possible allocation of this site is if / when the housing requirement for the District has been revised, all deliverable / developable sites for housing outside the AONB have been allocated for development yet housing needs can still not be met in full.

8.5 Does the Plan need an expressly stated spatial strategy for the District with target figures for each area to provide guidance for neighbourhood plans and for any future site allocations plan? What are the implications of not having such a strategy?

8.5.1 As set out in detail within our representations to the Pre Submission District Plan consultation and earlier in this Statement, it is essential for the District Plan to provide, as a minimum, indicative 'at least figures' to the towns and parishes in order to guide neighbourhood plans and / or any future site allocations plan.

8.5.2 As evidenced in our Statement, and in more detail within the Developer Forum Statement to Housing Matter 8.5, the Council's reliance on neighbourhood plans, and the lack of strategic spatial guidance provided by the District Plan, is already resulting in emerging neighbourhood plans providing for significantly lower levels of housing than those identified as suitable / necessary in the Council's HEDNA Update November 2015 (even though this is a level of growth as set out within our Statement to Matter 1 that is fundamentally too low).

8.5.2 In the absence of such spatial strategy guidance, the District Plan as currently drafted is vague, ineffective and is resulting in a highly unsustainable pattern of development. Consequently, the District Plan is unsound as it is neither justified or effective.

9. Trajectories

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

- 9.1.1 The Housing Trajectory at Appendix A of the District Plan purports to demonstrate that it would deliver a 5-year land supply. However, this is flawed for a variety of reasons.
- 9.1.2 Firstly, the Trajectory, even taken at face value, does not deliver a 5-year supply against a genuine OAN, which must be at least 1,000 dpa (as set out within our response to Housing Matter 1 and in detail in the Statement of the Developer Forum).
- 9.1.3 Secondly, the Trajectory shows that allocations from the District Plan make limited material contribution to housing supply in the first five years after adoption. Instead there is significant reliance on existing commitments. However, the District Plan provides no clarity on the commitments included in the Housing Trajectory. As such is it not possible to interrogate its accuracy.
- 9.1.4 Thirdly, the Trajectory includes the Pease Pottage strategic allocation comprising 600 dwellings within the AONB. As referred above within our response to Housing Matter 8.4, this allocation is wholly unsound and must be deleted.
- 9.1.5 Fourthly, it is difficult to envisage development on the Burgess Hill Northern Arc commencing as early as 2018/19 and even if it were to do so, a knowledge of the delivery of strategic sites would confirm that it clearly would not deliver 172 units in each of the first three years. We understand that the promoters of the Northern Arc will be present at the Examination and they can of course explain to the Examination their intended delivery profile.
- 9.1.6 Notwithstanding our overarching concern that the Trajectory is based on a housing requirement which is fundamentally too low, given the above Gleeson Developments Ltd is of the view that the District Plan spatial strategy and the Council's strategic site delivery assumptions will not deliver housing, either in terms of its total quantum or timescales, as that envisaged within the Trajectory. This highlights a fundamental deficiency in the housing strategy – a reliance on too few large sites with long lead times, and a lack smaller sites with shorter lead in times that could deliver quickly at the front end of the Plan period.

9.2 What are the reasons for the proposed timing of the site allocations plan?

9.2.1 Gleeson Developments Ltd agrees with the position set out within the Development Forum statement to Housing Matter 9.2.

10. Five-year housing land supply

- 10.1 With regard to Questions **10.1 to 10.6** please refer to our representations to the Pre Submission District Plan and Focused Amendments to the District Plan and the Development Forum statement to Housing Matter 10.

Threshold guide for services and facilities

The table below is based on desktop research from the following four publications:

- Shaping Neighbourhoods
- Urban Design Compendium
- Urban Task Force Report
- Approaching Urban Design

	Shaping Neighbourhoods		Urban Design Compendium		Urban Task Force Report		Approaching Urban Design		Approx overall average/ guide	
	Illustrative catchment populations	Approx number of homes (2.4 people / home)	Illustrative catchment populations	Approx number of homes (2.4 people / home)	Illustrative catchment populations	Approx number of homes (2.4 people / home)	Illustrative catchment populations	Approx number of homes (2.4 people / home)	Population	Households
Nursery/ first school	2,000	830	2,000	830	2,500	1,050	N/A	N/A	2,250	940
Primary/ middle school (2-form entry)	4,000	1,660	4,000	1,660	4,000	1,660	2,500-4,000	1,050-1,660	3,250	1,350
Secondary school	8,000	3,330	N/A	N/A	N/A	N/A	7,000	2,920	7,500	3,125
Secondary school (large)	16,000	6,670	N/A	N/A	N/A	N/A	15,000	6,250	15,500	6,460
Health centre	10,000	4,170	N/A	N/A	N/A	N/A	9,000-12,000	3,750-5,000	10,500	4,375
Youth club	N/A	N/A	N/A	N/A	N/A	N/A	7,000-11,000	2,920-4,580	9,000	3,750
Doctor's surgery	N/A	N/A	4,000	1,660	2,500-3,000	1,050-1,250	2,500-3,000	1,050-1,250	3,250	1,350
Pharmacy	N/A	N/A	5,000	2,080	N/A	N/A	N/A	N/A	5,000	2,080
Local shop	1,500	625	N/A	N/A	2,000-5,000	830-2,080	2,000-5,000	830-2,080	3,250	1,350
Pub	N/A	N/A	6,000	2,500	5,000-7,000	2,080-2,920	5,000-7,000	2,080-2,920	5,000	2,080
Post office	5,000	2,080	5,000	2,080	5,000-10,000	2,080-4,160	5,000-10,000	2,080-4,160	7,500	3,125
Library	N/A	N/A	N/A	N/A	N/A	N/A	12,000-30,000	5,000-12,500	21,000	8,750
Church	N/A	N/A	N/A	N/A	N/A	N/A	9,000	3,750	9,000	3,750
Community centre	4,000	1,670	4,000	1,660	N/A	N/A	7,000-15,000	2,920-6,250	9,500	3,960
Local centre	6,000	2,500	N/A	N/A	5,000 – 10,000	2,080-4,160	3,000-10,000	1,250-4,160	6,000	2,500
District centre	24,000	10,000	N/A	N/A	N/A	N/A	25,000-40,000	10,420-16,670	32,000	13,330
Leisure centre	24,000	10,000	24,000	10,000	N/A	N/A	25,000-40,000	10,420-16,670	32,000	13,330