

Mid Sussex District Council: Site Allocations Development Plan Document **May 2020**

Statement of Common Ground – Addendum to Memorandum of Understanding January 2016

Parties to the Agreement

The Agreement involves the following local planning authorities:

- Mid Sussex District Council
- Lewes District Council

Introduction

This Statement of Common Ground is an addendum to the Memorandum of Understanding signed in January 2016 between the Parties to the Agreement. More specifically its overall aim is to demonstrate that ongoing and appropriate engagement and co-ordination is taking place between the parties that includes planning for the identified cross-boundary strategic planning issues that exist and/or likely to arise resulting from the Mid Sussex District Council emerging Site Allocations Development Plan Document (DPD).

Current Position

Mid Sussex District Council adopted the District Plan (2014 – 2031) in March 2018. The District Plan identified a housing requirement for the district of 16,390 dwellings up to 2031. This meets the Objectively Assessed Need (OAN) for the district of 14,892 dwellings in full and makes provision for the agreed quantum of unmet housing need for the Northern West Sussex Housing Market Area, to be addressed within Mid Sussex, of 1,498 dwellings. The emerging Mid Sussex Site Allocations DPD has four main aims, which are:

- To allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan;
- To allocate sufficient employment land to meet the residual need and in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development;
- To allocate a site for a Science and Technology Park west of Burgess Hill in line with policy requirements set out in District Plan Policy DP1: Sustainable Economic Development, and
- To set out additional Strategic Policies necessary to deliver sustainable development.

The Site Allocations DPD policies are strategic and, once adopted, will form part of the Development Plan for the district.

The Site Allocations DPD proposes 22 housing site allocations and 7 employment site allocations to ensure that the housing and employment requirements as identified by the District Plan are met in full.

The Site Allocations DPD has been informed by a comprehensive suite of technical evidence, including Sustainability Appraisal and Habitats Regulations Assessment.

Strategic Planning Issues

The following strategic/ cross-boundary planning issues have been identified that relate to the Mid Sussex Site Allocations DPD and the parties:

1. Housing Provision

Mid Sussex District Council adopted the District Plan (2014 – 2031) in March 2018. The District Plan identified a housing requirement for the district of 16,390 dwellings up to 2031. This meets the Objectively Assessed Need (OAN) for the district of 14,892 dwellings in full and makes provision for the agreed quantum of unmet housing need for the Northern West Sussex Housing Market Area, to be addressed within Mid Sussex, of 1,498 dwellings.

One of the aims of the Site Allocations DPD is to allocate sufficient housing sites to address the residual necessary to meet the identified housing requirement for the district up to 2031 in accordance with the Spatial Strategy set out in the District Plan. District Plan Policy DP4: Housing indicates that, as at 1st April 2017, there was a residual amount of 2,439 dwellings to be allocated through future Neighbourhood Plans and the Site Allocations DPD. This residual amount has been updated as at 1st April 2019, and is now 1,507 dwellings.

Policy SA11: Additional Housing Allocations of the Site Allocations DPD proposes to allocate 22 housing sites, that will deliver around 1,962 dwellings. This amount ensures the residual is fully met and provides a reasonable over-allocation to provide flexibility.

The Parties agree that the Site Allocations DPD is seeking to allocate sufficient sites to ensure the housing requirement for Mid Sussex is met in full. The Parties agree the site allocations offer an opportunity to make a positive contribution to delivering sustainable residential development. The Parties agree to continue working together on any cross-boundary issues arising from the site allocations. A separate Statement of Common Ground between Mid Sussex, Lewes District Council and East Sussex County Council will be prepared to agree the transport implications of the proposed site allocations within Lewes District.

2. Ashdown Forest Special Protection Area and Special Area of Conservation

The Site Allocations DPD is informed by a suite of technical evidence including the Habitats Regulations Assessment and air quality modelling work that comprehensively tests the emerging Site Allocations DPD options to ensure there is no adverse effect on the integrity of the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC).

Habitats Regulations Assessment

The Regulation 19 Habitats Regulations Assessment concludes that the Regulation 19 Site Allocations DPD does not present any potential risks to European sites that it is considered are not capable of being mitigated. New SANG options are proposed in Policy SA20 and are considered to present a viable option for additional SANG capacity to meet the growth provided for by the site allocations. The preferred growth scenario as presented in the Site Allocations DPD does not present air quality impacts that are significantly higher than other growth scenarios and includes additional measures in terms of highways improvements that will serve to improve the functioning of the road network and reduce congestion. As demonstrated by the transport and air quality modelling work, these highways improvements are beneficial by improving traffic conditions on routes through Ashdown Forest. The modelling results for the growth scenarios are such that the breaches of 1% of the critical

loads are so low that, having regard for the wider context, are considered to be a minor retardation low enough to be ruled out from adverse effects. The Habitats Regulations Assessment will be updated and expanded accordingly to inform the post-Examination stage.

SAC – Air Quality

Both parties are active members and attend regular meetings of the Ashdown Forest SAC Working Group, which is chaired by the South Downs National Park Authority. A separate Statement of Common Ground was prepared by the group and both parties are signatories of the Ashdown Forest Statement of Common Ground that was published in April 2018.

The Ashdown Forest SAC Working Group is ongoing and both parties continue to work together alongside the other partners of the group.

Policy SA38 seeks to ensure there is not an unacceptable impact on air quality from development proposals. It applies generally, in relation to Air Quality Management Areas, and in relation to the Ashdown Forest SPA and SAC.

SPA – Recreational Disturbance

Both parties are signatories to another Statement of Common Ground setting out a joint approach to the Ashdown Forest SPA in relation to visitor pressure. This sets out agreement that there is a role for a Strategic Access Management and Monitoring (SAMM) partnership for all relevant local authorities as they work together as part of a joint approach to mitigation for recreational disturbance for new residential development. Both parties have agreed that 7km is the appropriate mitigation zone to collect SAMM contributions, based on the technical evidence of the Ashdown Forest Visitor Survey. The SAMM partnership of six local authorities and the Conservators of Ashdown Forest works together on the formation and operation of a legal partnership for SAMM regarding the Ashdown Forest SPA to address issues arising from visitor pressure. There is ongoing partnership work to progress the Joint SAMM Strategy.

Other Planning Issues

Other planning issues that may need to be considered in future planning documents include climate change, carbon reduction and renewable energy. The parties will work together on these issues as appropriate.

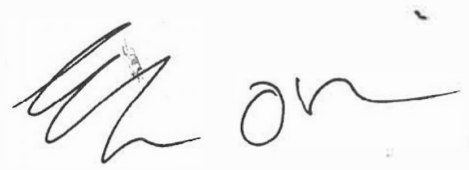

Liaison

The parties have engaged on an ongoing basis throughout the preparation of the Site Allocations DPD. Specific engagement has taken place at key stages during plan preparation including revision of the methodology for identifying sites for potential allocation, including for the Strategic Housing and Employment Land Availability Assessment (SHELAA) and for site selection, and during preparation of the Draft Plan.

Conclusion

Lewes District Council and Mid Sussex District Council agree that they continue to engage on an ongoing basis throughout preparation of the Site Allocations DPD and thus continue to have regard to the Duty-to-Cooperate.

Lewes District Council and Mid Sussex District Council agree to continue to work together on the areas of ongoing work discussed in this Statement of Common Ground. The Parties agree to work towards a position of agreement on the emerging Site Allocations DPD.

<div>Signed:</div> <div></div> <div>Dated: 10/7/2020</div>	<div>Signed:</div> <div></div> <div>Dated: 20/07/20</div>
<div>Cllr Emily O'Brien</div> <div>Cabinet Member for Planning</div> <div>Lewes District Council</div>	<div>Cllr Andrew MacNaughton</div> <div>Cabinet Member for Housing and Planning</div> <div>Mid Sussex District Council</div>