

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

Statement of Common Ground **Parties to the Agreement**

The Agreement involves the following local planning authorities:

- Mid Sussex District Council
- Wealden District Council

Introduction

This Statement of Common Ground is an update 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) that has been published for 'Preferred Options' Consultation 9th October to 20th November 2019.

Wealden District Council and Mid Sussex District Council also signed a Statement of Common Ground in July 2019 that was prepared to inform the Wealden Local Plan. It should be noted that the Wealden Local Plan was subject to independent examination by the Planning Inspectorate in 2019. Following an Inspector's letter (December 2019) regarding the examination of the Wealden Local Plan that concluded that the Local Plan could not proceed further in the examination process, Wealden District Council resolved to withdraw the Wealden Local Plan on 19 February 2020. The Council is currently identifying and considering options in relation to the best approach to prepare a new local plan and will be seeking to adopt a timetable through Local Development Scheme (LDS) shortly.

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:

- i. 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;
- ii. 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;
- iii. 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
- iv. 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 these allocations do not raise any cross-boundary issues and offer an opportunity to make a positive contribution to delivering sustainable residential development.

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).

The Regulation 18 Habitats Regulations Assessment concludes that at this point in time, the 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 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. 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 Regulation 19 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 Mid Sussex District Council is a signatory of the Ashdown Forest Statement of Common Ground that was published in April 2018. Although Wealden District Council attended the Working Group and made amendments to the Ashdown Forest Statement of Common Ground, it did not become a signatory. Wealden District Council published a Position Paper outlining the reasons why the Council was not a signatory to the document. Following the withdrawal of the Wealden Local Plan and its associated evidence base, Wealden District Council is working collaboratively with the Ashdown Forest working group and in due course an updated SoCG will be drafted to reflect the current position.

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

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.

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 at 'Preferred Options' (Regulation 18) stage. Wealden District Council did provide a formal response to Mid Sussex District Council for its Draft Plan at the 'Preferred Options' (Regulation 18) stage.

Conclusion

Wealden District Council and Mid Sussex District Council agree that they have engaged on an ongoing basis throughout preparation of the Site Allocations DPD and on this basis that the Duty-to-Cooperate has been met.

Wealden District Council and Mid Sussex District Council agree that there are no areas of disagreement between the parties relating to the emerging Site Allocations DPD and to

continue to work together on the areas of ongoing work discussed in this Statement of Common Ground.

<p>Signed:</p>  <p>Dated: 22nd June 2020</p>	<p>Signed:</p>  <p>Dated: 22nd June 2020</p>
<p>Cllr Ann Newton Deputy Leader and Planning and Development Portfolio Holder Wealden District Council</p>	<p>Cllr Andrew MacNaughton Cabinet Member for Housing and Planning Mid Sussex District Council</p>