

[REDACTED]

From: [REDACTED]
Sent: 18 November 2020 11:46
To: [REDACTED]
Subject: FW: Mid Sussex Viability review

From: Simon Drummond-Hay <simon@hdhplanning.co.uk>
Sent: 27 October 2020 13:27
To: [REDACTED]
Subject: RE: Mid Sussex Viability review

[REDACTED]

The Site Allocations document is simply a site allocations document that seeks to bring forward additional sites for development, ensuring that the Council has a 5 year land supply and can meet the housing delivery test. Five generic policies are included in the plan which relate to existing employment sites (SA34), safeguarding land for strategic highway improvements (SA35), Wivelsfield Railway Station (SA36), Burgess Hill to Haywards Heath Multifunctional Network (SA37) and Air Quality (SA38). However, unlike some similar plans brought forward by other Councils, it does not seek to introduce a new suite of policies that result in an additional financial burden on development; for example seeking higher environmental standards or the like. To a large extent the plan is bringing forward more of the same type of sites that have been / are being delivered under the Mid Sussex District Plan 2014-2031.

Most development that is being consented and is being delivered under the Mid Sussex District Plan 2014-2031 is fully policy compliant, suggesting the policy requirements are not preventing the delivery of development.

Paragraph 61-038-20190315 if the PPG sets out the requirements for evidence:

How can strategic policy-making authorities gather evidence needed to justify policies?

Policies need to be justified. Evidence to underpin policies can be taken from a wide variety of sources, including the Authority Monitoring Report and planning application and appeal decisions. Strategic policy-making authorities will need to consider carefully the need to commission evidence that will add delay and cost to plan production. Wherever possible, authorities may wish to prepare evidence in-house or jointly to speed up the process, and obtain best value for the taxpayer. Strategic policy-making authorities may wish to seek advice on this, for example, from the Planning Advisory Service as part of their ongoing plan-making support.

The evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. Strategic policy-making authorities may wish to consider ensuring that their assessment of and strategies for housing, employment and other uses are integrated, and that they take account of relevant market signals.

Wherever possible, assessments can share the same evidence base and be conducted over similar timescales, but strategic policy-making authorities need to take care to ensure that the purposes and statutory requirements of different assessment processes are respected.

Assessments should be proportionate, and should not repeat policy assessment that has already been undertaken. Wherever possible, strategic policy-making authorities should consider how the preparation of any assessment will contribute to the plan's evidence base. The process should be started early in the plan-making process and key stakeholders should be consulted in identifying the issues and any relevant data that the assessment must cover.

Paragraph: 038 Reference ID: 61-038-20190315

It is accepted that if the Site Allocations Plan was to bring forward a range of sites that was to be notably different to those in the Mid Sussex District Plan 2014-2031 (so considered in the evidence to support that Plan), then it would

be necessary to undertake a more detailed assessment of viability. Likewise, if the Council were seeking to introduce new policies then it would be necessary to undertake a more detailed assessment of viability.

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