

# **Mid Sussex Site Allocations DPD Examination**

## **Matter 7 Statement on behalf of A2Dominion**

May 2021

**Turley**

# Contents

1.	Introduction	3
2.	Response to Matter 7 – Development Management, Uncertainties and Risks	4

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**Client**

A2 Dominion Group

**Our reference**

A2DS3001

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# **1. Introduction**

- 1.1 This Statement has been prepared by Turley on behalf of A2Dominion in relation to Matter 3 of the Mid Sussex District Council Site Allocations DPD Examination.
- 1.2 A2Dominion have also submitted Statements in response to Matters 1, 2, 3, 4 and 8 of the Examination.

## 2. Response to Matter 7 – Development Management, Uncertainties and Risks

### 7.1 Development Management: Does the Plan provide sufficient guidance to cover all the relevant aspects of development management which are required to achieve the satisfactory implementation of the Plan?

- 2.1 The only comment we make in this regard is that the SADPD policies include requirements that schemes comply with other policies.
- 2.2 In this regard we note that paragraph 16 of the NPPF 2019 sets out various criteria including that: *“Plans should ... f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”*.

### 7.2 Uncertainties and Risks: Overall, does the Plan take sufficient account of uncertainties and risks? How flexible is it?

- 2.3 Our Statement to Matter 3 sets out the significant uncertainties and risks associated with housing delivery matters, and the extremely marginal nature of the ‘buffer’ over the minimum housing requirement of Policy DP4 of the District Plan.
- 2.4 In our submission:
- The LPA’s evidence base does not enable a conclusion to be made (in accordance with paragraph 67 of the NPPF 2019) that the housing trajectory provides a *“sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability”*;
  - The LPA’s evidence base does not enable a conclusion to be made (in accordance with paragraph 16 of the NPPF 2019), that the Plan is ‘deliverable’;
  - The LPA’s evidence base does not enable a conclusion to be made (in accordance with paragraph 11 of the NPPF 2019) that the Plan is sufficiently flexible to adapt to rapid change;
  - The consequence of these considerations is that the Plan is not then shown to be ‘Effective’ as required by paragraph 36 of the NPPF 2019 which sets out ‘tests of soundness’, requiring that the Plan be *“deliverable over the plan period”*; and
  - The Plan cannot therefore be said to be ‘Positively prepared’ as required by paragraph 36 of the NPPF 2019 which sets out ‘tests of soundness’, requiring that the Plan *“as a minimum, seeks to meet the area’s objectively assessed needs...”*

**7.3 Monitoring: Are the monitoring arrangements soundly based? Should biodiversity net gain be monitored?**

2.5 No comment.

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