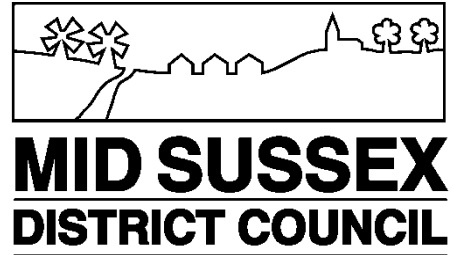


**Mid Sussex
District Council**



Site Allocations DPD

MSDC-02g: Matter 7 - Development management, uncertainties and risks

14th May 2021

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?

MSDC Response

- 1.1. MSDC is satisfied that the Sites DPD and the suggested Minor modifications [DPD2] provide sufficient guidance to Development Management. SA GEN alongside the site-specific housing and employment provides a clear policy framework to enable satisfactory implementation of the Plan. In addition, policies SA34 – SA38 provide sufficient guidance to enable them to be successfully implemented and policy objectives achieved.
- 1.2. Responses received during Plan consultation in relation to clarity and policy interpretation have been considered and wording amended when required.
- 1.3. The primary role of the Sites DPD is to allocate sites to meet the residual housing and employment requirements. The policies within the Sites DPD will be considered in combination with other policies within the development plan (e.g. the District Plan and Neighbourhood Plans) as well as other guidance (e.g. Supplementary Planning Documents) which have been through their own examination and preparation procedures.

7.2 Uncertainties and Risks

Overall, does the Plan take sufficient account of uncertainties and risks? How flexible is it?

MSDC Response

- 2.1. MSDC is satisfied that the Sites DPD is sufficiently flexible to account for uncertainties and risks that may arise during the Plan period. The Sites allocated in the Sites DPD are of a mix of sizes and types, with a District-wide geographical spread. In addition, the Sites DPD allocates sites that in total will provide more housing and employment land than is required to deliver District Plan requirements – an over-supply of 484 dwellings and 2.45ha of employment land. This provides flexibility to ensure the housing and employment requirements are met in full, even if there were unexpected issues with deliverability within the plan period.
- 2.2. The Council has worked closely with the site promoters/developers of the allocated sites during the preparation of the Sites DPD to ensure that any barriers to timely delivery of sites have been/can be addressed to mitigate risks and uncertainties.
- 2.3. The Council also carries out thorough and robust monitoring of its housing land supply and has sought to address issues within the Sites DPD (for instance by accounting for delivery outside the plan period from strategic sites). This is further evidenced in the response to Matters 3.3 [MSDC-02c] and 5.2 [MSDC-02e].
- 2.4. The Council considers the Sites DPD is a flexible and effective Plan.

7.3 Monitoring

Are the monitoring arrangements soundly based? Should biodiversity net gain be monitored?

MSDC Response

- 3.1. The proposed monitoring framework for the Sites DPD is set out in Appendix B [DPD1]. For each policy, the monitoring schedule identifies the indicator(s), target, implementation and monitoring source. The Council considers the monitoring framework to be appropriate and sound which will result in an effective plan. Data sources are available for each indicator and are in the control of the Council which means there is no reliance on other parties to monitor the indicator and provide the data.
- 3.2. No representations were received at either the Regulation 18 or Regulation 19 stage in relation to the monitoring framework.

Biodiversity net gain

- 3.3. In its Regulation 19 representation, Natural England [Representation ID number 710] recommended that biodiversity net gain should be monitored. Policy SA GEN includes a requirement for the site allocation policies to secure a net gain in biodiversity.
- 3.4. The Government is proposing to include mandatory biodiversity net gain through the Environment Bill which is anticipated to receive Royal Assent in Autumn 2021. Further detail is expected on how mandatory biodiversity net gain will be implemented. As a result, it is difficult at this stage to have any certainty over the requirements for mandatory biodiversity net gain and what might need to be monitored. It is expected that monitoring will be long term.
- 3.5. Nevertheless, the Council agrees that biodiversity net gain will need to be monitored, but the best place to secure this will be through the District Plan Review once there is more certainty over the requirements emerging from the Environment Bill. However, the Council has already started work to collate information to inform and support any future approach to biodiversity net gain and nature recovery networks.
- 3.6. For any of the site allocations delivered after the adoption of the Sites DPD and prior to the implementation of mandatory biodiversity net gain, relevant information and data will need to be submitted to the Council at the planning application stage in order for officers to determine if an application is policy compliant in relation to biodiversity net gain. Measures to monitor and manage the biodiversity net gain delivered through the allocations can also be secured through a Section 106 planning obligation. All of this information will also be gathered by the Council as part of its work to develop an approach to biodiversity net gain.
- 3.7. The scope of the District Plan Review includes a review of current policies and further technical work will be undertaken as part of the evidence base as well as engagement with stakeholders. This is the appropriate stage of plan-making to consider new strategic policies and a monitoring framework for biodiversity net gain. The Council would welcome further engagement with Natural England and other stakeholders such

as the Sussex Wildlife Trust and the Sussex Local Nature Partnership during the development of an approach to biodiversity net gain.