

**Contact:**

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**Your Ref:**

**Our Ref:** AMN/EF

**Date:**

28<sup>th</sup> October 2020

[planningforthefuture@communities.gov.uk](mailto:planningforthefuture@communities.gov.uk)  
(by email)

Dear Sirs,

Thank you for the opportunity to comment on the White Paper "Planning for the Future". Mid Sussex District Council's full response is attached. I agree with the Prime Minister's comments in the foreword, the proposed reforms are radical and promises a whole new planning system for England.

There is much in the White Paper this Council supports, in particular: the continued emphasis on a Plan led system to allocating development; setting some Development Management policies nationally; that all allocated sites should benefit from the automatic permission in principle; the stronger emphasis on ensuring developers build out permissions with penalties for those that do not implement their permissions; the emphasis on capturing a greater proportion of the land value uplift and using this to enhance infrastructure delivery; and the stronger emphasis on enforcement.

However, given the scale and extent of the proposals I would urge the Government to carefully review a number of the proposals, which as currently drafted, could have significant and detrimental impacts on our environment and the quality of life for our residents. In addition, some of the proposals appear to be undemocratic and I am sure this is not the Government's intention.

In Mid Sussex the current adopted housing number is an average of 964dpa which accounts for unmet need from Crawley. This is already extremely challenging to deliver. However, the recent consultation for this District increases the number to 1,305dpa without including any unmet need. This Council is therefore concerned that delivering this level of housing will impact on the local environment and our communities. As a consequence, I must emphasise how important it is that local constraints must be taken into account when setting binding housing numbers. Mid Sussex is characterised by its historic settlements set in beautiful countryside much of which is protected for its particular qualities. Nearly 50% of the District is designated as AONB and Mid Sussex is the tenth most wooded District in the South East with two thirds of this woodland classified as ancient. The District also has many sites valued for its outstanding biodiversity and heritage qualities including Sites of Special Scientific Interest, Sites of Nature Conservation Importance, its 36 Conservation Areas, over 1,000 nationally listed buildings and 500 Sites of Archaeological Interest. A 'one size fits all' or formula approach that discounts for constraints is too simplistic. Consideration of the local context is crucial, local communities must not be denied the opportunity to present evidence of constraints.

The proposals in the White Paper also fail to set out how statutory legal obligations such as the Habitats Directive will be taken into account. For Mid Sussex District Council, particular regard must be paid to the Ashdown Forest Special Area of Conservation/Special Protection Area which is impacted by atmospheric pollution. It is difficult to understand how the proposals in the White Paper will model impacts such as this if blanket zones are imposed or where there is no certainty

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over the type of development. Setting a binding housing number without robust local scrutiny and evidence testing is likely to lead to significant local challenge thereby causing uncertainty and delay – the very things this White Paper is seeking to avoid.

This Council is strongly opposed to any proposals that new settlements should be progressed through the Nationally Significant Infrastructure Projects (NSIP) regime. This would totally contradict the White Paper's purported intention to develop a "more engaging, equitable and effective system" and indeed "a much more democratic system that is open to a wider range of people whose voice is currently not heard". Such a process undermines the emphasis in the White Paper on a Plan led system and would appear to render the plan making processes defunct until such time as there was resolution over new settlement proposals. It is considered far better and more democratic to continue to progress such work through the plan led system.

Finally, this Council is extremely concerned about the proposals for a consolidated Infrastructure Levy and the implications of this on the provision of affordable housing. Housing costs are extremely high in the District and the provision of affordable housing is a priority in ensuring sustainable communities. The proposed changes place the provision of affordable housing in competition with the provision of other infrastructure. Under the current planning system, the requirement for affordable housing is based on the applicable threshold and secured via a Section 106 agreement. This mechanism ensures the delivery of the affordable housing is protected over the long term.

I trust that you will carefully consider this Council's detailed response which is attached.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'A MacNaughton', written in a cursive style.

Councillor Andrew MacNaughton  
Cabinet Member for Housing and Planning