

**MID SUSSEX**  
**DISTRICT COUNCIL**

# **Statement of Common Ground**

**MSDC and Wealden District Council**

**July 2024**

### 1. List of parties involved

Mid Sussex District Council (MSDC)  
Wealden District Council (WDC)

### 2. Signatories



Date: 31 July 2024  
Mid Sussex District Council  
Ann Biggs – Assistant Director for Planning and Sustainable Economy

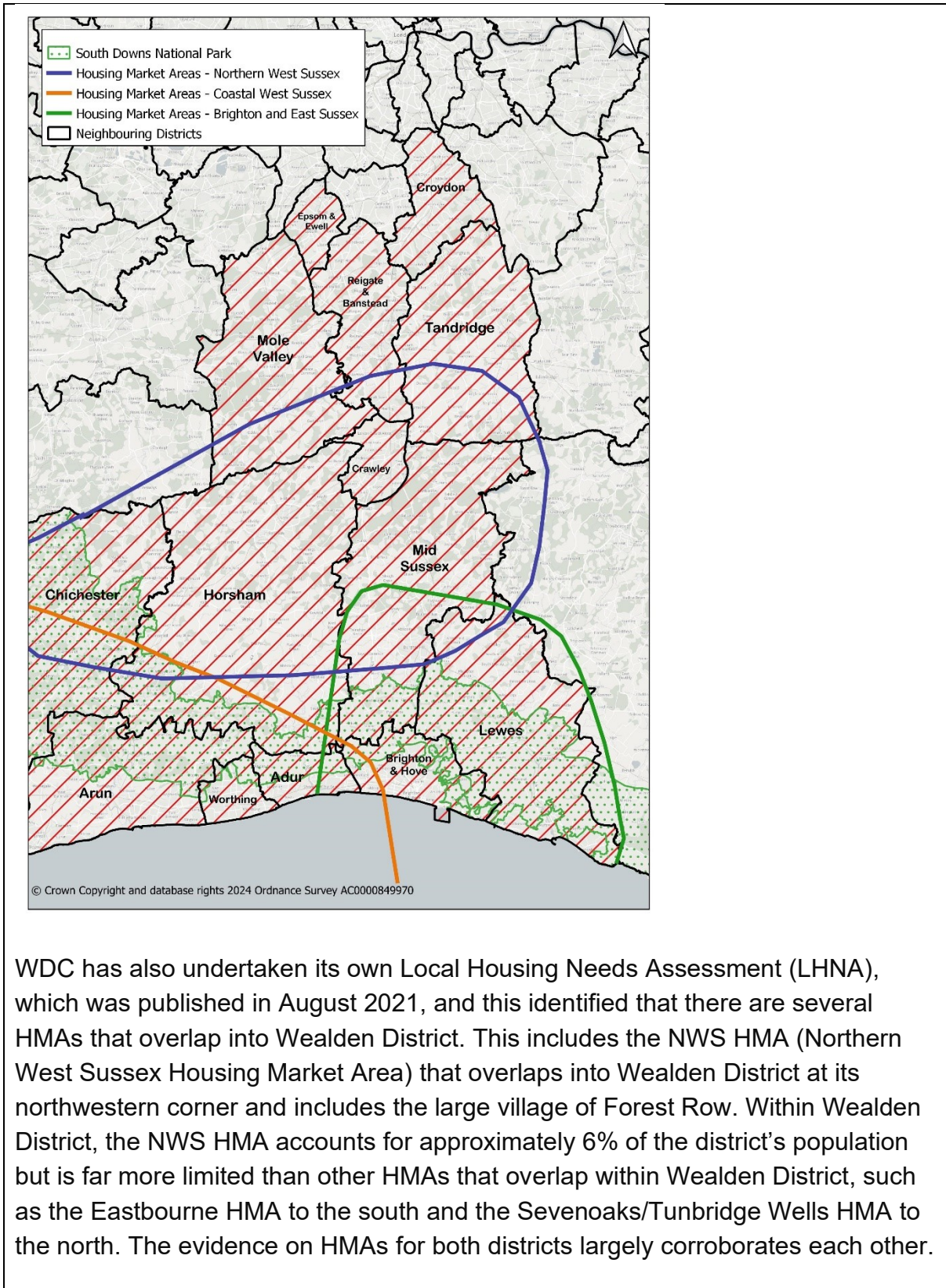


Date: 31 July 2024  
Wealden District Council  
**Ian Tysh: Planning and Environment Portfolio Holder**

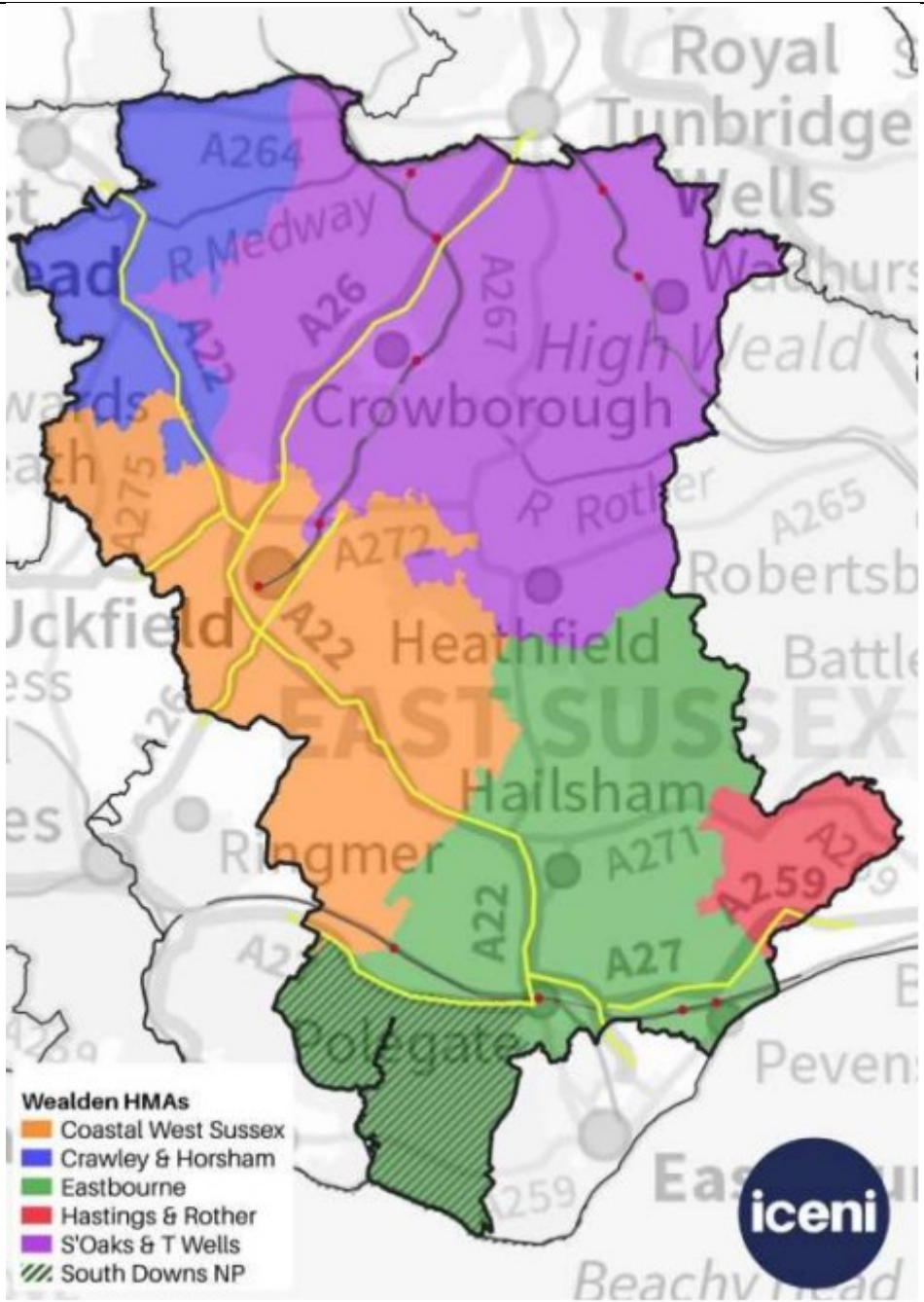
### 3. Strategic Geography

Mid Sussex district is within the county of West Sussex, which adjoins the county of East Sussex at its eastern boundary. This boundary is shared with Lewes and Wealden District Councils, both in East Sussex.

Mid Sussex falls primarily within the Northern West Sussex Housing Market Area (NWS HMA), which also covers Crawley Borough Council and Horsham District Council. This has been confirmed by an updated Strategic Housing Market Assessment (SHMA, 2021), but that there are some overlaps with neighbouring HMAs.



WDC has also undertaken its own Local Housing Needs Assessment (LHNA), which was published in August 2021, and this identified that there are several HMAs that overlap into Wealden District. This includes the NWS HMA (Northern West Sussex Housing Market Area) that overlaps into Wealden District at its northwestern corner and includes the large village of Forest Row. Within Wealden District, the NWS HMA accounts for approximately 6% of the district's population but is far more limited than other HMAs that overlap within Wealden District, such as the Eastbourne HMA to the south and the Sevenoaks/Tunbridge Wells HMA to the north. The evidence on HMAs for both districts largely corroborates each other.



Source: IcenI, based on ONS data.

MSDC and WDC are at different stages in their Local Plan preparation. WDC consulted on its Regulation 18 Local Plan between March and May 2024 with its Regulation 19 Local Plan anticipated for winter 2024/25, with its submission by 30 June 2025. This Statement of Common Ground (SOCG) demonstrates that the duty to cooperate on strategic matters has been met during the preparation of the MSDC District Plan Review, in advance of the plan’s examination.

4. Strategic Matters

This SOCG should be read in conjunction with the MSDC Duty to Cooperate Statement of Compliance, which sets out the wider context of strategic matters pertinent to the District Plan and provides details of ongoing and effective engagement with neighbouring local authorities and other public bodies.

For their respective areas, MSDC and WDC have identified the following strategic matters during the preparation of previous (adopted) and current (emerging) local plans:

- Housing (including Housing Market Areas (HMAs))
- Accommodation for Gypsies, Travellers and Travelling Showpeople
- Employment (including Functional Economic Market Areas (FEMA))
- Infrastructure (Transport and Education)
- Natural Environment (including High Weald National Landscape)
- Ashdown Forest

Matters relating to the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA) are the subject of a separate SOCG and are not discussed further in this Statement.

### Housing Need

MSDC has a standard method housing need figure of 19,620 dwellings over the District Plan period (2021-2039). In addition to completions since 2021 and commitments (existing allocations and permissions), this need will be met through the creation of three sustainable communities, a range of smaller housing sites and an evidence-based windfall allowance. The District Plan provides an oversupply of 996 dwellings against this requirement, adding resilience to housing delivery in Mid Sussex, should any commitments not be delivered as expected. This is set out in policy DPH1: Housing in the submission draft District Plan.

Since Regulation 19, the standard method housing need figure has changed to reflect the updated affordability ratios. MSDC will put forward a proposed modification at submission to update the housing need figure in DPH1. A modification will also be proposed to extend the Plan period to 2040 to ensure compliance with the NPPF. These modifications, should they be accepted by the Inspector, will slightly increase the over-supply.

WDC is at an earlier stage of plan preparation, having carried out a Regulation 18 Local Plan consultation during March-May 2024. WDC's identified housing need figure in that Local Plan is 19,800 dwellings (1,200 dpa) for the period 1 October 2023 to 31 March 2040. In a similar vein to MSDC, the housing requirement has since been adjusted, and is marginally lower at 1,186 dpa, due to the publication of

the affordability ratios. Due to the environmental and infrastructure constraints identified, WDC currently identifies that its realistic housing supply figure is 15,729 dwellings (953 dpa) over the proposed plan period, resulting in a shortfall of 4,071 dwellings.

The parties agree:

1. Mid Sussex primarily falls within the NWS HMA. Neither of the authorities' evidence bases conclude they are within the same HMA, although it is considered that a small part of the NWS HMA does overlap within Wealden District at its northwestern edge (incorporating Forest Row).
2. The supply of suitable, available and developable land identified to date in Wealden district is insufficient to meet the district's housing needs. The emerging Wealden Local Plan (Regulation 18) identified a housing shortfall of 4,071 dwellings over the plan period to 2040, against the current housing requirement of 19,800 dwellings, set by the standard method. WDC will endeavour to address this deficit as part of its Submission Wealden Local Plan (Regulation 19) but may not be able to do so due to the environmental and infrastructure constraints identified.
3. The draft Mid Sussex Plan (Regulation 18) was published in November 2022, and the proposed submission plan (Regulation 19) was published in January 2024. The District Plan covers the period 2021-2039 and will supersede the current District Plan 2014-2031 (adopted 2018). It is based on a housing requirement of 19,620 dwellings, set by the standard method. In addition to completions since 2021 and commitments (existing allocations and permissions), this need will be met through the creation of three sustainable communities, a range of smaller housing sites, and an evidence-based windfall allowance. The District Plan provides an oversupply of 996 dwellings against its requirement, as a buffer to improve the resilience of the plan to under-delivery.
4. Each authority has assessed the ability of its area to accommodate housing development. Protected landscapes such as the High Weald National Landscape in the Mid Sussex plan area (covering 49% of Mid Sussex district) and South Downs National Park (covering approximately 11% of Mid Sussex district) in the south of the district constrain the amount of suitable land for development in Mid Sussex. The High Weald National Landscape (accounting for 53% of Wealden District) also significantly constrains the amount of available and suitable land that can be identified



for development in Wealden. The South Downs National Park also accounts for 7% of Wealden District to the south of the A27.

5. MSDC has shared and invited comments from WDC on the methodology and conclusions of its site selection process ahead of Regulation 18 consultation on the District Plan. In accordance with the site selection methodology, Mid Sussex has selected what it considers to be the most suitable and sustainable sites for allocation in the District Plan Review to meet Mid Sussex housing needs. There are currently insufficient available, suitable and developable sites in Mid Sussex to meet unmet need from Wealden. The parties consider they are doing the maximum reasonable to meet their respective housing needs.
6. MSDC and WDC will engage with all local authorities on their HMAs in terms of housing-related matters, including affordability, strategic developments, and opportunities for meeting unmet need.
7. Subject to meeting its own housing needs and establishing that there is potential to assist other local authorities with unmet needs in the future, MSDC will prioritise assistance as follows in accordance with the findings of the Mid Sussex Strategic Housing Market Assessment (SHMA):
  - Priority 1: Northern West Sussex HMA
  - Priority 2: Coastal West Sussex HMA
  - Priority 3: Other adjacent and nearby HMAs, where justified by evidence of strong functional links between the local authority areas
8. The draft District Plan (2021-2039) allocates one housing site (DPA13: The Paddocks, Lewes Road, Ashurst Wood) for 8-12 dwellings near to the shared boundary between MSDC and WDC. Potential cross boundary impacts have been considered and assessed through MSDC's evidence base work with no impacts being identified. WDC has not identified site allocations within its draft Local Plan at this stage that are on or near to the shared boundary between MSDC and WDC.

#### Gypsies, Travellers and Travelling Showpeople

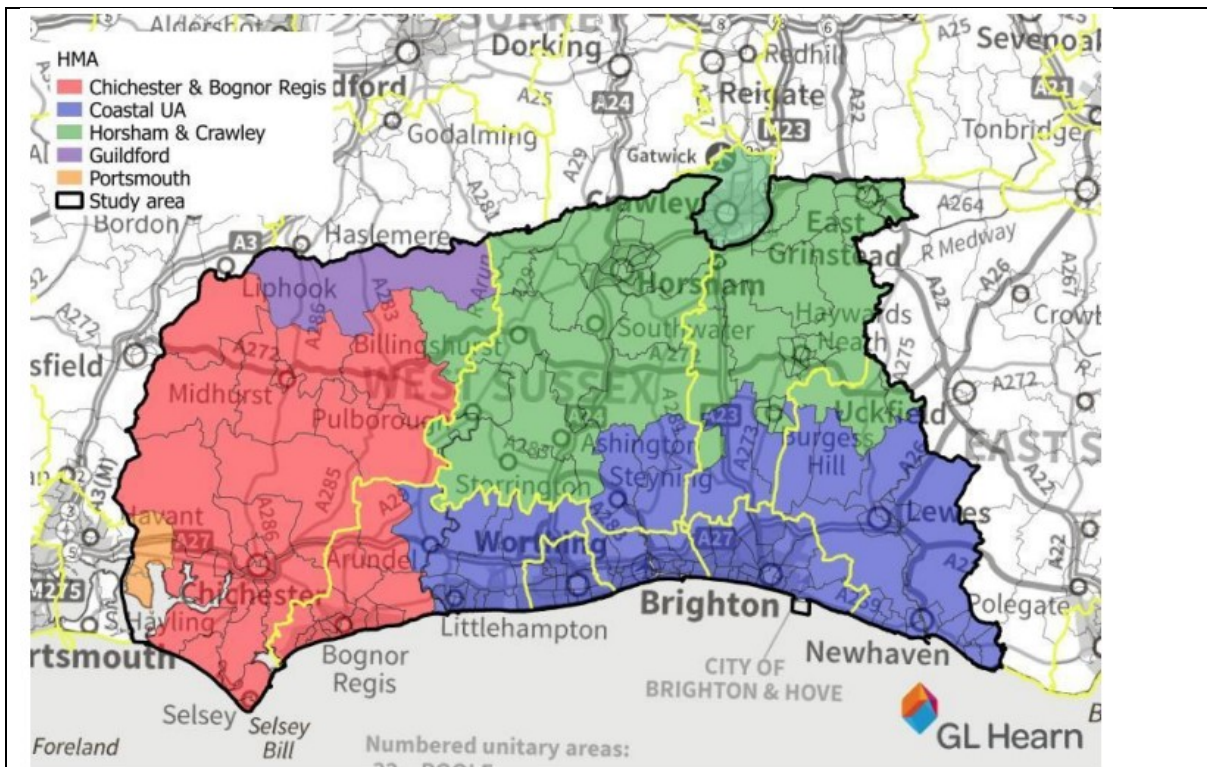
9. The identified need for accommodation for Gypsies, Travellers and Travelling Showpeople in Mid Sussex District is met through the Northern Arc (Brookleigh) strategic site allocation at Burgess Hill (allocated in the District Plan 2018) and the significant sites to be allocated through the District Plan Review (DPSC1 – DPSC3).

10. WDC has undertaken its Gypsy and Traveller Accommodation Needs Assessment (GTAA) jointly with other local planning authorities within East Sussex until 2040. The GTAA produced a wider ethnic definition of need (51 pitches), as well as definition produced using the Planning Policy for Traveller Sites (PPTS) definition (32 pitches). At this stage in the plan-making process, the Council has not yet identified pitches to meet this accommodation need but will do this in the lead up to the Regulation 19 Local Plan.
11. Both authorities agree that they are seeking to meet their own need for accommodation for Gypsies, Travellers and Travelling Showpeople.

### Employment

12. The Economic Growth Assessment (EGA) (2020) produced jointly between MSDC, Horsham DC and Crawley BC (updated for Mid Sussex in 2022) highlights a high degree of economic interrelationship between the three districts which together form the Northern West Sussex Functional Economic Market Area (NWS FEMA). To a lesser extent there are also functional economic links between Mid Sussex and Wealden. The EGA considers the latest growth projections and identifies no outstanding residual employment need for the district, as there is sufficient committed supply (planning permissions and site allocations) to meet employment needs in Mid Sussex.
13. The Employment and Economic Study for Eastbourne and Wealden (April 2022) identifies future employment land needs for both offices (Use Class E(g)i) and for industrial and warehouse uses (use classes B2 and B8). WDC's Regulation 18 Local Plan identifies a potential shortfall of employment floorspace of between 85,548 and 104,044 sqm. WDC are seeking to update their employment study to align with the plan period to 2040. WDC are also undertaking a 'Call for Sites' process that is seeking to identify further employment land.

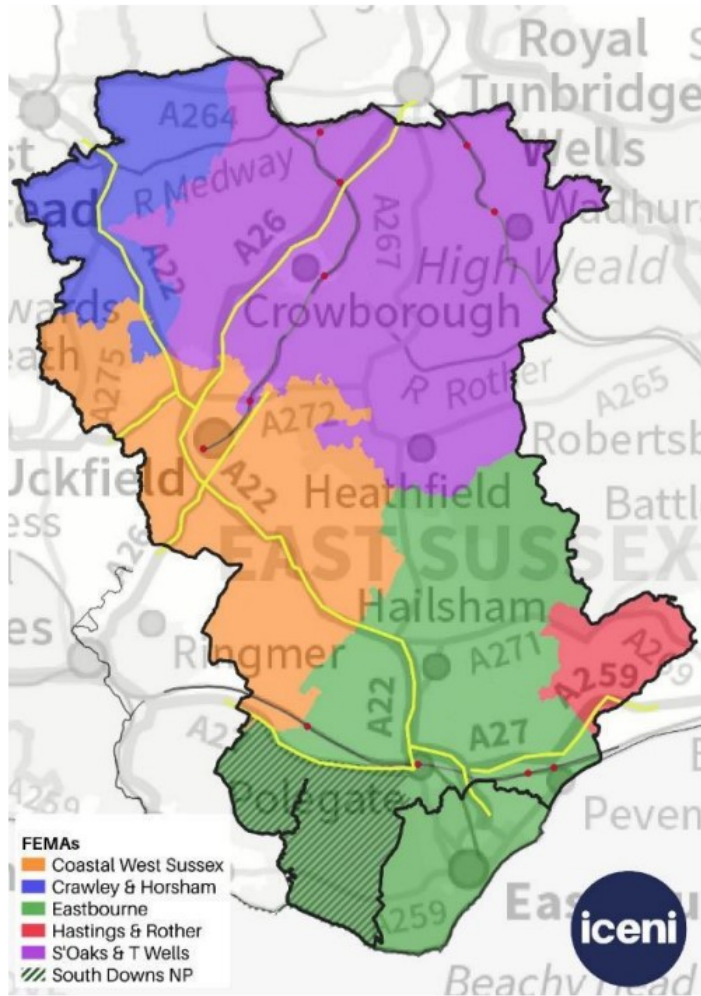




Source: Defining the HMA and FEMA, GL Hearn (2017)

14. The parties recognise that Mid Sussex falls within the Northern West Sussex FEMA although it is considered that a small part of the NWS FEMA does overlap within Wealden District at its northwestern edge (incorporating Forest Row) that is shown in Wealden's Economic and Employment Study below.

Figure 2.4 – Functional Economic Market Areas



Source: IcenI Projects and Open Streetmap

15. The Mid Sussex District Plan Review includes a requirement for 5,000-9,000 square metres Class E employment floorspace as part of the significant site at Sayers Common (Policy DPSC3). Existing allocations in Mid Sussex include a Science and Technology Park to the west of Burgess Hill. Site Allocations DPD Policy SA9: Science and Technology Park allocates a 49 hectare site north of the A2300, and will be saved on adoption of the District Plan 2021-2039. Existing allocations and development proposed in the draft Plan will support employment growth.
16. The parties agree these allocations do not raise any adverse cross-boundary issues and offer an opportunity to make a positive contribution to delivering sustainable economic development.

17. WDC and MSDC will engage with all local authorities in their FEMAs on strategic matters relating to employment and sustainable economic growth, including identifying opportunities for meeting unmet need.

## Infrastructure

### *Transport*

18. The Mid Sussex Transport Report Scenario 5 (January 2024) has analysed the impact of development scenarios in the District Plan Review on the strategic and local road network.

19. The main road routes between Mid Sussex and Wealden are the A22 and A272. The Transport Report identifies no severe or significant impacts on either route within Wealden as a result of the development scenarios within the Mid Sussex District Plan Review.

20. WDC have been working with East Sussex County Council (ESCC) and other local authorities to develop existing strategies and transport mitigation packages supported by transport modelling data as part of the Regulation 18 draft Local Plan. WDC has published the Wealden Local Plan Shared Transport Evidence Base (STEB) that assesses several early development options that were considered for the Regulation 18 draft Local Plan. Potential highways impacts have been highlighted at this stage of the plan-making process, particularly around the A22 and A26 corridor, which will likely constrain growth in the south and north of the District respectively, particularly around Hailsham and Uckfield and the surrounding areas, accounting for cumulative impacts

21. WDC will continue to work with partners as the plan progresses to the Regulation 19 stage to develop its understanding and policy position to ensure that development can be supported by sustainable transport modes, accessible and integrated active travel, and can secure appropriate transport mitigation. This work will align with both the emerging East Sussex Local Transport Plan 4, which is a partnership plan being developed by ESCC, outcomes from transport modelling in relation to mitigation required as well as the Transport Strategy for the South East (2020).

22. The parties agree that cross-boundary transport impacts have been assessed during the preparation of the District Plan and there are no outstanding strategic transport matters to be resolved under the duty to cooperate.

## *Education*

23. Education provision is managed by WSCC and ESCC for MSDC and WDC respectively. Both Councils work collaboratively with the County Councils to share information on known housing commitments with their respective administrative areas, including projections as to when and where new housing development will come forward. This allows for ESCC and WSCC to plan for future school places at both primary and secondary schools and to increase capacity on existing school sites where this is appropriate.

24. Both WDC and MSDC will work with ESCC and WSCC on education provision as part of their respective Local Plans. Each Council will work with ESCC, WSCC and developers to ensure that new educational provision is delivered either on site, or in close proximity to the new development. Both Councils are endeavouring to support ESCC and WSCC in ensuring that it is able to deliver the appropriate education capacity in locations where new growth is expected.

## 5. Governance Arrangements

The authorities are committed to working positively together and sharing information and best practice throughout the plan preparation phase and beyond.

This cooperation and collaboration takes place at senior officer level and technical officer level. This SoCG is signed at Head of Service level for MSDC and Portfolio Holder level for WDC and will be reviewed at each key stage of plan-making, including when WDC intends to submit its Local Plan in 2025. It will be updated to reflect progress made through effective cooperation.

In terms of governance, the parties agree:

1. MSDC and WDC have engaged on an ongoing basis throughout preparation of the District Plan Review and consider that the Duty-to-Cooperate has been met.
2. The parties will continue to work with the other local authorities in their respective Housing and Economic Market Areas on housing, employment, and other strategic issues.
3. The parties will work collaboratively on plan preparation and evidence, whilst acknowledging each other's timetables and timescales.
4. They respect each other's right to develop their own plans that fit the specific circumstances of the local authority's communities.

5. The parties will meet at officer level to review emerging evidence and respond to new issues and changing circumstances.
6. The parties will update this SoCG as progress continues through the preparation of the local plans and development plan documents for each of the authorities.

6. Timetable for review and ongoing cooperation

<b>LPA</b>	<b>Present Plan Adoption</b>	<b>Proposed Plan Review Date</b>	<b>Regulation 18 Date</b>	<b>Regulation 19 Date</b>	<b>Target Submission Date</b>
Mid Sussex District Plan	March 2018	2022-2024	November 2022	January 2024	Summer 2024
Wealden District Local Plan	February 2013	2024-2026	March 2024	Winter 2024/25	Summer 2025