
**Examination of the Submitted Mid Sussex
Local Plan**

**STATEMENT FOR STAGE 1 HEARINGS:
MATTER 6 – HOUSING**

WRITTEN STATEMENT

Prepared by:

Woolf Bond Planning Ltd

On behalf of:

Taylor Wimpey Strategic Land Ltd

Respondent ID: 1190898

September 2024

WBP Ref: 8166



Woolf Bond Planning
Chartered Town Planning Consultants

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Executive Summary

Taylor Wimpey Strategic Land Ltd (“TWSL”) have a controlling interest in a sustainably located and deliverable site at land off Hurstwood Lane, Haywards Heath which is proposed to be allocated in policy DPA5 as an integral element of the strategy for meeting the identified housing need during the plan period.

Although the inclusion of the site as an allocation is supported, as detailed in the representations TWSL have concerns with the Plan as prepared in its failure to ensure sufficient housing growth (in terms of the overall housing target in Policy DPH1) and consequently does not include sufficient land to meet its needs. Accordingly, additional site allocations should be identified.

TWSL’s representations may be summarised as follows:

- *The Plan is **not positively prepared** in so far as the proposed strategy for growth will fail to deliver the identified housing need. It should plan for the at least 1,090 dwellings annually over a minimum 20 year plan period from 2021 until 2041; it should also include a higher target to contribute towards the unmet needs of neighbouring authorities, including the City of Brighton & Hove and Crawley Borough as referenced in the representations (paragraph 2.14);*
- *The Plan is **not consistent with national policy** having regard to the obligation to provide a strategy for at least 15 years post adoption.*

The failure to provide sufficient deliverable site allocations will serve to frustrate attempts to address key factors affecting worsening affordability and denying people the opportunity to own their own home, contrary to Government policy under paragraph 60 of the NPPF which is seeking to significantly boost the supply of housing to address the current housing crisis.

Whilst the land off Hurstwood Lane, Haywards Heath should be retained as an allocation in policy DPA5, the overall housing requirement must be increased above the current 1,090dpa with the plan period extended to cover the period from 2021 until at least 2041.

The above changes are necessary to ensure the Local Plan satisfies the tests of soundness at paragraph 35 of the NPPF (September 2023)¹.

¹ Paragraph 230 of the ‘current’ NPPF (Dec 2023) states that Local Plans that reach the Regulation 19 stage before 19 March 2024 will be examined under the relevant previous version of the NPPF. As such, the Mid Sussex Local Plan is to be examined against the requirements contained in the September 2023 NPPF.

CONTEXT AND BACKGROUND

- 1.1. This Statement has been prepared by Woolf Bond Planning Ltd on behalf of Taylor Wimpey Strategic Land Ltd (“TWSL”), and addresses several questions posed for Matter 6 of the Stage 1 Hearing Sessions as set out in the Inspector’s Schedule of Matters, Issues and Question (“MIQs”) (ID-004).
- 1.2. In setting out our response, we continue to rely upon the content of our detailed Regulation 19 representations (“our Representations”) submitted on behalf of TWSL in response to the Regulation 19 consultation on the Draft Local Plan on 23rd February 2024.
- 1.3. As set out at footnote 1 on page 2 above, the Local Plan is being examined for consistency against the September 2023 version of the NPPF. Accordingly, all references to the NPPF in this Statement relate to that version (unless otherwise stated).
- 1.4. Our answers to the questions should be read in the context of our position that insufficient deliverable and developable land has been identified in the submitted Local Plan in order to contribute towards addressing unmet needs of neighbouring authorities (NPPF paragraph 61) together with ensuring the strategy extends for at least 15 years after its adoption (NPPF paragraph 22).
- 1.5. The Plan would not be sound without modifications to include:
 - Extending the Plan period to 2041 (thus covering the period 2021 to 2041);
 - Increasing the housing requirement above the current 1,090dpa to make contributions towards addressing the unmet needs of neighbouring authorities; and
 - Additional site allocations (within revised settlement boundaries)
- 1.6. This Statement amplifies our Representations and references are made to that document where relevant.

MATTER 6: HOUSING

Issue 1: Whether the Council's approach to calculating its full, objectively assessed needs and housing requirement is justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?

Objectively Assessed Need - Housing

Question 57: Does the Plan period cover an appropriate time frame for the provision of housing (2021-2039) consistent with national policy? If not, what would be the implications for housing need?

- 2.1. No. The Plan as submitted does not cover an appropriate timeframe for the provision of housing. This was explained in paragraphs 2.8 to 2.16 of the Regulation 19 representations submitted by Woolf Bond Planning on behalf of TWSL, which highlighted the view of TWSL that due to the overly optimistic timeframe for examination of the Local Plan, adoption would not occur until early 2026.
- 2.2. With respect to the overly optimistic examination timeframe, paragraph 2.9 referenced the expectation in the Local Development Scheme (Examination Document reference P1) that the Inspector's Report would be received in autumn 2024 although the actual timeframe is clear that the Stage 1 hearings will not occur until then. The hearing sessions which the Local Development Scheme (P1) had envisaged for summer 2024 have therefore been delayed by at least 4 months), although given that this is only for stage 1, the overall timeframe for this will be significantly extended from that envisaged.
- 2.3. The subsequent receipt of the Inspector's Report cannot occur until all the relevant stages of the examination hearings have taken place and then the conclusions written up. There is also the potential for further consultation on any Main Modifications which the Inspector considers are necessary to the Plan, to address ours and other representations.
- 2.4. Based upon the earlier representations, our position remains that the Plan period should cover from April 2021 until at least March 2041. The implications for the District's housing need is for the overall requirement to be increased to

ensure it provides for at least 1,090 dwellings over the 20 year period suggested. This results in a minimum target for 21,800 dwellings as stated in paragraph 2.14 of the representation,

- 2.5. Extending the Plan period to ensure it reflects the obligations in NPPF paragraph 22 thereby ensuring that the Plan is both positively prepared and consistent with national policy.

Housing Requirement

Question 67 - Is a minimum housing requirement of 19,620 justified and consistent with national policy? What is the status of the 996 dwellings referenced within the table in Policy DPH1 as total under/over supply for resilience and unmet need? Should this figure be included within the annual housing requirement for the district?

- 2.6. No. As indicated in the representations, a minimum housing requirement of 19,620 dwellings is neither justified nor consistent with national policy. As indicated in the representation, the minimum housing requirement for the district should be for at least 21,800 dwellings over the period April 2021 to March 2041.
- 2.7. Furthermore, the district's housing requirement should include an uplift above 21,800 dwellings as a contribution towards the unmet needs of neighbouring authorities. The representations of TWSL specifically referenced the unmet needs arising in the adjoining authorities of the City of Brighton & Hove and Crawley Borough. This is covered further in the response to question 68.
- 2.8. The other elements of the Inspector's question are for the Council to answer.

Question 68 - Are there other considerations that are likely to drive an increase in the homes needed locally, such as any needs that cannot be met within neighbouring areas namely the 30,000 dwellings of unmet need identified up to 2050 in the Coastal West Sussex and Greater Brighton authorities, Housing Need and Requirement Topic Paper (HN RTP) (H5), and the more immediate housing needs of Crawley, Brighton and Horsham?

- 2.9. Since the consultation on the Draft Submission Local Plan and its subsequent submission for examination by the Secretary of State, the extent of unmet needs of the neighbouring authority of Crawley Borough has been confirmed.

This is following the conclusions of the examination of their Submitted Local Plan, for which the Inspector's Report was issued on 6th September 2024 (Examination Document O8). Paragraphs 14 to 31 detail the analysis of the compliance of Crawley Borough with the Duty to Co-operate with paragraphs 97 to 110 the assessment of Crawley Borough's housing need and supply. Of particular relevance to Mid Sussex district is the conclusions in the Inspector's Report into the Examination of Crawley Borough's Local Plan that there is outstanding unmet need of 7,505 dwellings over the period 2023-2040 (see paragraph 110).

- 2.10. Paragraphs 20 to 22 of the Inspector's Report into the Crawley Borough Local Plan (September 2024) references the approaches and mechanism they followed in seeking the resolution of their unmet need in the most sustainable strategy, primarily thorough consideration of the continued role of Mid Sussex and Horsham District's (as the extent of the Northern West Sussex Housing Market Area) for this (see paragraph 22).
- 2.11. As the extent of Crawley Borough's unmet need is confirmed at 7,505 dwellings (paragraph 110 of the Inspector's Report), it is considered that consistent with the representations (paragraph 2.14), that a significant proportion of this should be addressed through an uplift in Mid Sussex's requirements.
- 2.12. The initial view of TWSL is that the increase should be at least 3,500 dwellings, with a further 3,500 dwellings in Horsham District. This would recognise the inter-relationships of the Northern West Sussex authorities.
- 2.13. There should be a further uplift as a contribution towards meeting the unmet needs of other authorities, including the City of Brighton & Hove, as also referenced at paragraph 2.14 of the representation.

Question 72 - Are any main modifications necessary for soundness, if so, why?

- 2.14. Yes. As indicated in the representations (section 2) and this statement, main modifications to the Plan are essential to ensure that it is both positively prepared and consistent with national policy. The specific main modifications required are set out below.

Changes sought to the Local Plan

2.15. The following are necessary for the Local Plan to satisfy the tests of soundness at paragraph 35 of the NPPF:

- Extending the Plan period to 2041 (thus covering the period 2021 to 2041);
- Increasing the housing requirement arising directly from the district's housing needs to 21,800 (1,090dpa);
- That the housing requirement is increased by at least a further 3,500 dwellings as a contribution towards the confirmed unmet needs of Crawley Borough. This therefore takes the minimum requirement to at least 25,300 dwellings;
- That there is a further uplift above the 25,300 dwellings figure to make a contribution towards unmet needs arising from the City of Brighton & Hove and other adjoining local authorities; and
- Additional site allocations (within revised settlement boundaries) are included in the Plan.

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