

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

# **Statement of Common Ground**

**MSDC and Brighton & Hove City  
Council**

**July 2024**

### 1. List of parties involved

Mid Sussex District Council (MSDC)  
Brighton and Hove City Council (BHCC)

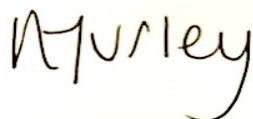
### 2. Signatories



Date: 22<sup>nd</sup> July 2024

Mid Sussex District Council

Ann Biggs – Assistant Director for Planning and Sustainable Economy



Date: 18/07/24

Brighton and Hove City Council

Head of Planning & Building Control

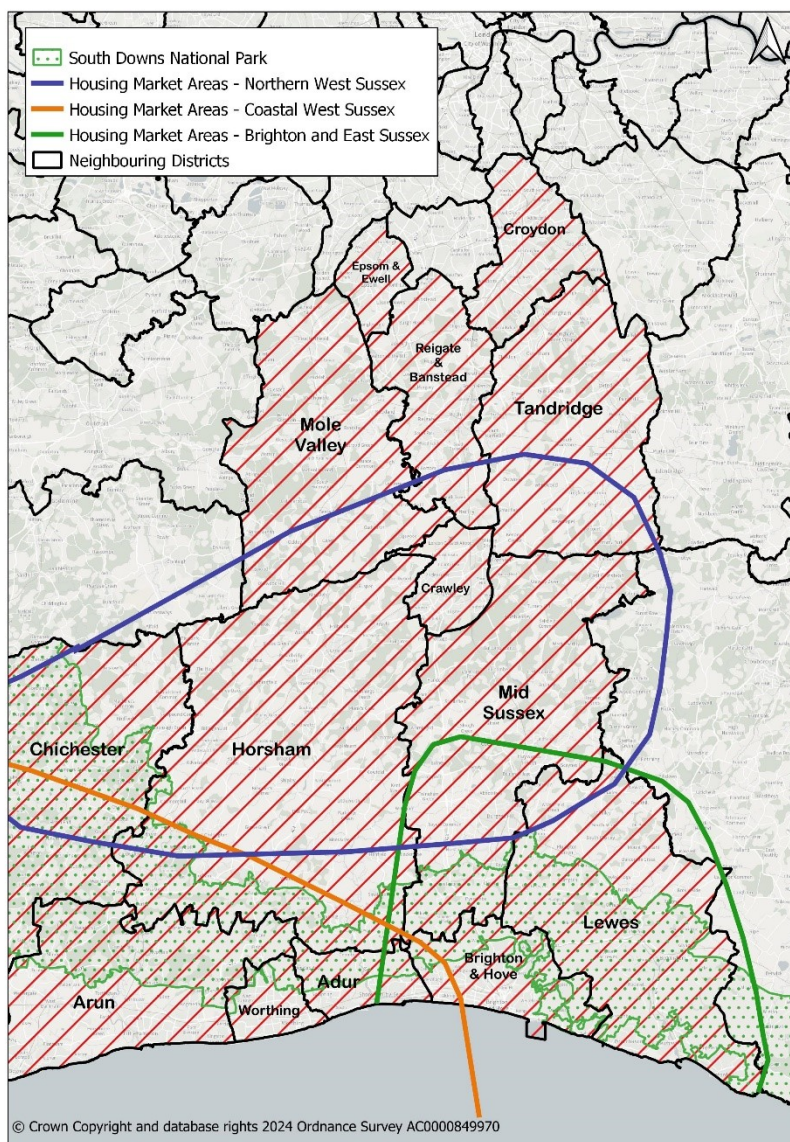
### 3. Strategic Geography

Mid Sussex district is situated within the county of West Sussex and adjoins Brighton and Hove at the district's southern boundary.

MSDC is one of the local authorities that make up the Greater Brighton City Region, along with Arun, Worthing, Adur, Crawley, Lewes, and Brighton & Hove. Both MSDC and BHCC are members of the West Sussex and Greater Brighton Strategic Planning Board, which has agreed a Memorandum of Understanding and a Local Strategic Statement (LSS). The LSS sets out strategic objectives and

spatial priorities to support regeneration and sustainable growth in the City Region area.

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), though the SHMA also recognises an overlap in the southern part of Mid Sussex with the Coastal West Sussex HMA. The very south of Mid Sussex falls within the South Downs National Park (SDNP). The Mid Sussex District Plan Review excludes the SDNP – the Local Plan for the SDNP is prepared by the South Downs National Park Authority.



MSDC and BHCC are at different stages in their Local Plan preparation, with BHCC intending to consult on key issues for a City Plan Review during autumn 2024 and to submit the plan for examination under the new plan-making system in

2026. This Statement of Common Ground 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.

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).

#### 4. Strategic Matters

This Statement of Common Ground 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 BHCC have identified the following strategic matters during the preparation of previous (adopted) and current (emerging) local plans:

1. Housing
2. Accommodation for Gypsies, Travellers and Travelling Showpeople
3. Employment
4. Transport

##### 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, 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.

BHCC is at an earlier stage of plan preparation, having recently commenced a review of the City Plan, with a focus on policies in the City Plan Part One, which was adopted in 2016. This will include an update to the City's housing need figure, which was identified as 30,120 dwellings for the period 2010 to 2030 in the 2016 City Plan. Due to the significant physical and environmental constraints affecting the city this need could not be met in full, with a housing target being set at 13,200 (660 dwellings per annum).

The starting point for the City Plan Review is the standard housing methodology. BHCC has significant unmet housing needs measured against the standard method, a situation compounded by its inclusion in the government's December 2020 amendment to the revised standard method that applies a 35% uplift to the housing need figures for the top 20 most populated cities and urban centres. At the time of writing, the standard method identifies housing needs of 2,333 homes per year for BHCC, comfortably exceeding the housing target contained within the adopted City Plan.

The parties agree:

5. Brighton and Hove is within the Coastal West Sussex HMA. Mid Sussex primarily falls within the NWS HMA, but to the south of the district there is an overlap with the Coastal West Sussex HMA.
6. The supply of suitable, available, and developable land in Brighton & Hove is insufficient to meet the City's housing needs. The BHCC City Plan (Parts One and Two) provides for approximately 44% of the housing need over the plan period to 2030, leaving a shortfall of c.17,000 dwellings, based on the objectively assessed need at the time. BHCC's current housing needs, quantified using the standard method, are significantly higher.
7. Protected landscapes such as the High Weald National Landscape (AONB) in the Mid Sussex plan area and South Downs National Park in the south of the district which also covers a significant part of Brighton & Hove constrain the amount of suitable land for development across both authorities. MSDC has shared and invited comments from BHCC 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. The authorities agree that the site selection process has been robust.

8. The capacities of the selected sites are considered on a site by site basis taking into consideration a range of factors including densities, landscape, heritage and environmental constraints. The capacity within the proposed allocation is approximate. There will be opportunities to consider increasing capacities subject to detailed consideration of design and landscape issues at the planning application stage.
9. There are currently insufficient available, suitable and developable sites in the southern area of Mid Sussex (within the Coastal West Sussex HMA) to meet unmet needs from Brighton and Hove beyond those already proposed for allocation.
10. BHCC and MSDC will engage with all local authorities in their HMAs on housing-related matters, including affordability, strategic developments, and opportunities for meeting unmet need.
11. MSDC's position is that 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 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
12. BHCC notes the position (11) of MSDC but does not agree with the prioritisation set out above. BHCC's view is that, given the scale of unmet housing need in the Coastal West Sussex HMA and those of Brighton & Hove in particular, options to explore meeting unmet need within the Coastal West Sussex HMA should not be secondary or contingent upon the consideration and/or resolution of unmet housing needs elsewhere.
13. BHCC is at an early stage of plan-making and has not yet determined its precise housing need and supply over the new plan period to 2041. However, the city is subject to major physical and environmental constraints that limit the potential for needs to be met and is likely to seek assistance from other authorities should needs be unable to be met as it has done for the preparation of previous plans. The two authorities will continue to work

together to understand this position and maximise housing delivery as the BHCC plan progresses.

### Gypsies, Travellers and Travelling Showpeople

14. The identified need for accommodation for Gypsies, Travellers and Travelling Showpeople in Mid Sussex 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). BHCC is currently updating their GTAA to inform the City Plan review.
15. The authorities agree to seek to meet their own need for accommodation for Gypsies, Travellers and Travelling Showpeople and agree to continued dialogue on this issue to examine opportunities for addressing any unmet needs.

### Employment

The Economic Growth Assessment Update (EGA) (March 2022) identifies employment need over the plan period. This is based on demographic data and employment growth projections. The EGA identifies a total requirement of 27.1ha of employment land (E(g)(i), (iii), B2, B8 and mixed B1) against a total committed supply (extant planning permission and allocations) of 44.3ha resulting in an oversupply of 17.2ha. The EGA identifies a potential deficit in Light/General industrial (E(g)(iii) which could be met by supply in Mixed B1 which includes Light/General Industrial uses. Furthermore, two proposed significant sites (DPSC2: Land at Crabtree Park and DPSC3: Land south of Reeds Lane) are proposing an element of onsite employment space to support the creation of sustainable communities.

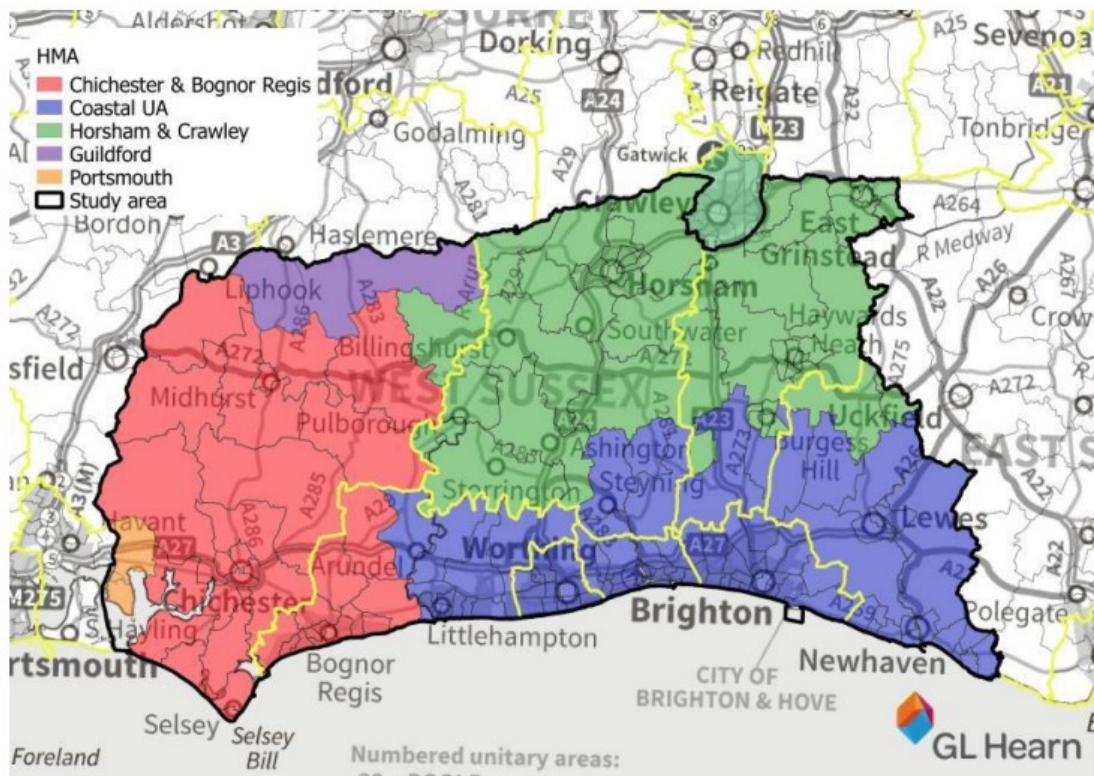
The parties agree:

16. The Economic Growth Assessment (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 in Northern West Sussex. To a lesser extent there are also functional economic links between Mid Sussex and Coastal West Sussex.
17. The Mid Sussex District Plan Review vision is to make Mid Sussex a vibrant and attractive place for business and people to thrive. This aspiration will contribute towards enhancing the prosperity of the Greater Brighton City Region, providing the opportunity for the residents of Mid Sussex to work

locally and reduce the need to commute. The parties will continue to collaborate on opportunities to support the wider economy.

18. The Mid Sussex EGA Update confirms that Mid Sussex falls within the Northern West Sussex Functional Economic Market Area (FEMA), though there is some overlap with the Coastal West Sussex FEMA in the south of the district. 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.

19. The 2024 Employment Land Study for the BHCC City Plan Part 1 Review has forecast a need for additional 56,000 sq m of industrial land over the period to 2041. The analysis shows strong demand for industrial space from growth sectors including the cultural industries which are not currently being met in the city. BHCC is unlikely to be able to allocate sufficient land to meet this need, due to physical and environmental constraints. It is noted that Mid Sussex is perceived as a strong industrial location with mainly distribution uses driving market demand and cumulative 13.2% expansion of stock in the last three years



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



20. that the part of Mid Sussex falling within the Coastal West Sussex FEMA is largely within the SDNP, where planning functions sit with the SDNP Authority.
21. 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.
22. 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). This development, in combination with saved allocations under previous Mid Sussex plans, will support employment growth in the Greater Brighton City Regional area, ensuring economic activity is retained in the region.
23. BHCC notes the position of Mid Sussex and considers that it will be important to ensure that existing employment floorspace in Mid Sussex is protected and the identified pipeline of sites is maintained over the plan period. MSDC notes that there are specific policies in the District Plan to protect employment space and to encourage intensification and expansion where suitable.
24. These allocations do not raise any adverse cross-boundary issues and offer an opportunity to make a positive contribution to delivering sustainable economic development.
25. BHCC 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.

### Transport

The Mid Sussex Strategic Transport Study considers the impacts of emerging District Plan development scenarios on the local and strategic road network. The Mid Sussex Strategic Highway Model (MSSHM) which underpins the study was produced in accordance with standard good practice as set out in the Department for Transport's (DfT) transport analysis guidance (TAG), and in consultation with WSCC HA and NH.

The impacts on the highway network of the agreed development scenarios have been assessed based on the National Planning Policy Framework (NPPF) using criteria agreed by MSDC and WSCC.

The main road route between Mid Sussex and Brighton & Hove is the A23. The MSDC Strategic Transport Study Report for Scenario 5 (January 2024) for sets out that there are no cross-boundary ‘severely’ impacted locations arising from planned growth in the Plan in any of the Scenarios tested.

The parties agree:

- 26. 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 at this time.

#### 5. Governance Arrangements

The authorities are committed to working positively together and as part of the Greater Brighton City Region through the preparation of their plans and beyond.

This co-operation and collaboration take place at senior officer and technical officer level. This Statement of Common Ground is signed at Head of Service level and will be reviewed at each key stage of plan-making.

In terms of governance, the parties agree:

- 27. MSDC and BHCC have engaged on an ongoing basis throughout preparation of the District Plan Review and consider that the Duty-to-Cooperate has been met.
- 28. The parties will continue to work with other local authorities in the Coastal West Sussex Housing and Economic Market Areas on housing, employment, and other strategic issues.
- 29. The parties will work collaboratively on plan preparation and evidence, whilst acknowledging each other’s timetables and timescales.
- 30. The parties will meet at officer level at appropriate times to review emerging evidence and respond to new issues and changing circumstances.
- 31. The parties will update this SoCG at appropriate stages of each authority’s plan preparation progress.

#### 6. Timetable for review and ongoing cooperation

LPA	Present Plan Adoption	Regulation 18 Date	Regulation 19 Date	Target Submission Date	

Mid Sussex District Plan	March 2018	November 2022	January 2024	Summer 2024	
Brighton & Hove City Plan	March 2016 / October 2022	Autumn 2024	Summer 2026	Autumn 2026	