

ABC0260/07.01

**Charlotte Glancy
C/O Banks Solutions
80 Lavinia Way
East Preston
West Sussex
BN16 1DD**

30 September 2024

Dear Charlotte,

**Response to Stage 1 Matters, Issues and Question
Mid Sussex District Plan 2021-2039 Examination
Andrew Black Consulting on behalf of Antler Homes
DP15 – Ham Lane Farm House, Ham Lane, Scaynes Hill**

I write on behalf of my client Antler Homes to submit a response in relation to the Stage 1 Matters Issues and Questions (MIQs) from the inspector of the Mid Sussex District Plan 2021-2039.

Antler Homes has a controlling interest in site DPA15 (Ham Lane Farm House, Ham Lane, Scaynes Hill) which is allocated in the submission version of the plan for 30 dwellings.

ABC will be representing Antler Homes in part 2 of the hearings where detailed information can be presented to the inspector to demonstrate the soundness of the allocation of the site under policy DP15 and demonstrate the at site is deliverable in the first five years of the plan period.

These representations deal with all matters set out in the stage 1 MIQs.

MATTER 1: LEGAL AND PROCEDURAL REQUIREMENTS

Issue 1: Whether the Plan has been prepared in line with the relevant legal requirements and procedural matters?

Plan Preparation

- 1. Has the Plan been prepared in accordance with the Local Development Scheme in terms of its form, scope, and timing?***

The Statement of Consultation (Regulation 22) (Document C1) sets out the process followed by the council in line with the Town and Country Planning (Local Planning) (England) Regulations 2012. Section 2 of the document demonstrates that the plan has been prepared in accordance with the Local Development Scheme.

- 2. Have requirements been met in terms of the preparation of the Plan, notification, consultation and publication and submission of documents?***

As set out the Statement of Consultation (Regulation 22) (Document C1) provides clear details of the notification, consultation and publication process of the Local Plan.

- 3. Has the preparation of the Plan complied with the Statement of Community Involvement?***

The Statement of Consultation (Regulation 22) (Document C1) demonstrates that consultation on the preparation of the District Plan has been undertaken in accordance with the relevant regulations and the adopted Statement of Community Involvement (SCI) (document C6). The SCI requires a bespoke Community Involvement Plan (CIP) to be prepared for each consultation which has been followed by the council.

- 4. In relation to those who have a relevant protected characteristic, how does the Plan seek to ensure that due regard is had to the three aims expressed in s149 of the Equality Act 2010?***

This is a matter for the council to respond on.

Sustainability Appraisal

- 5. Has the plan been subject to Sustainability Appraisal (SA), including a report on the published plan, which demonstrates, in a transparent manner, how the SA and Site Selection Methodology (SSP1) have influenced the evolution of the plan making process. For example, could I be directed to where the sites have been ranked against each other as referenced in paragraph 36 of SSP1? What if anything is the cut off threshold? Have the requirements for Strategic Environmental Assessment been met?***

The submitted plan, and previous consultation versions, are accompanied by a full Sustainability Appraisal (Document DP8).

Chapter 4 of the SA for the regulation 18 consultation version (DP8) of the local plan sets the 42 reasonable alternative sites which were identified following assessment of the 260 sites in the Site Selection Methodology (SSP1). The 44 sites were assessed against the SA criteria, and this is set out in Appendix C of the SA.

It is considered that all requirements for Strategic Environmental Assessment have been fully met.

6. Is the non- technical summary suitably concise? Has the SA followed the correct processes in terms of content and consultation? In particular, is the scoring methodology within the SA consistent, coherent and accurate?

Yes. The Non-technical summary (Document DP7) is concise and demonstrates the process followed through the previous consultation processes.

The Sustainability Appraisal Objectives (as summarised in table 1 of the non-technical summary) have remained consistent throughout the previous iterations of the local plan.

With specific reference to site DP15, the scoring methodology has been consistent and individual scores have remained consistent between the regulation 18 and regulation 19 version of the plan as shown below:

Policy Reference	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health & Wellbeing	Education	Community & Crime	Flooding	Natural Resources	Biodiversity	Landscape	Cultural Heritage	Climate Change & Transport	Energy & Waste	Water Resources	Economic Regeneration	Economic Growth
DPH23	+	+	+	+	+	-	0	0	0	0	0	0	0	+

Figure 1 – Regulation 18 SA

Policy Option DPA15	SA Objective													
	1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Housing	Health and Wellbeing	Education	Community and Crime	Flooding & Surface Water	Natural Resources	Biodiversity & Geodiversity	Landscape	Cultural Heritage	Climate change & transport	Energy and Waste	Water Resources	Economic regeneration	Economic growth
	+	+	+	+	+	-	0	0	0	0	0	0	0	+

Figure 2 – Regulation 19 SA

7. Have all reasonable alternatives been considered in terms of spatial strategy, policies, and sites including increases in density or housing numbers?

Yes. Section 4.2 of the Regulation 19 SA (Document DP7) sets out the reasonable alternatives in terms of spatial options for the plan with five separate options identified in total.

Section 6.3 of the SA then goes on to consider reasonable alternatives in respect of other potential sites and section 6.4 assesses these against the SA objectives.

8. Have these reasonable alternatives, been considered on a like for like basis? Is the evidence on which the scenarios are predicated consistent and available from the Examination website? What is the significance if any, to the robustness of the SA, of the publication of additional evidence, such as transport and flood risk evidence after the Plan was submitted? Are there any policies, or strategies, where there were no reasonable alternative options to consider? If so, what is the justification?

This is a matter for the council to respond on.

9. Has the SA of the Pre-submission Plan been subject to consultation with the consultation bodies? What concerns have been raised and what is the Council's response to these?

This is a matter for the council to respond on.

Habitats Regulations Assessment

10. What role has Natural England played in the production of the Habitats Regulations Assessment and how has the Council had due regard to its professional expertise and its guidance?

This is a matter for the council to respond on.

11. Is the Plan, as submitted, likely to have a significant effect on European sites either alone, or in combination with other plans or projects? Have these other plans or projects been appropriately identified?

This is a matter for the council to respond on.

12. Have the appropriate assessments of the implications for those sites been undertaken in a manner consistent with the sites' conservation objectives?

This is a matter for the council to respond on.

13. In doing so, are the appropriate assessments, and evidence underpinning them, capable of ascertaining that the Plan as submitted will not adversely affect the integrity of the European sites and their qualifying features, either alone, or in combination?

This is a matter for the council to respond on.

14. If the mitigation measures set out in the Habitats Regulations Assessment are required, what evidence is there that these will work over the lifetime of the plan and beyond?

This is a matter for the council to respond on.

15. Is the Plan's strategy and distribution of development consistent with the recommendations of the Habitats Regulation Assessment?

This is a matter for the council to respond on.

Other Matters

16. Does the Plan include all relevant strategic policies to address the Council's priorities and adequately set out an overall strategy for development as required by paragraphs 20-23 of the National Planning Policy Framework (the Framework)? Specifically, please set out how each of the individual categories set out within criteria 20 a) to 20 d) are justified by up to date and proportionate evidence and,

where this has been supplied by developers, the extent to which it should be relied upon?

Yes, the plan seeks to address and make sufficient provision for the categories identified within parts a to d of paragraph 20 of the framework. The council has done this with reference to footnote 11 of the framework which requires this to be in line with presumption in favour of sustainable development.

17. Has the Council had regard to the specific matters set out in S19 of the 2004 Act (as amended) and Regulation 10?

As required under section 19 (1B)-(1E) of the Planning and Compulsory Purchase Act 2004 the council has identified the strategic priorities as part of the Vision and Objectives section of the Local Plan as submitted.

The individual policies clearly indicate which strategic objectives are addressed within each policy.

The plan is considered wholly compliant in this regard.

18. What is the relationship between the policies of the submitted Plan and the made Neighbourhood Plans within the district?

There are a number of 'made' Neighbourhood plans in the district. For the purposes of the land at DPA15, this is within the area covered by the Neighbourhood Plan for Lindfield and Lindfield Rural Neighbourhood Plan which was made in March 2016. This is now substantially out of date and the policies within the submitted local plan will take precedence over the policies within it.

19. Does the Plan include policies in relation to the mitigation of and adaptation to climate change? If so which?

Yes. *Sustainable Development and Adaption to Climate Change* is a Strategic Objective which is referred to throughout the submitted plan. Policy DPS1 deals specifically with Climate Change.

20. Have the policies of the Plan in appropriately elevated extant and future specific studies, such as supplementary planning guidance, and other standards to development plan status? If so, what modifications are required to rectify this?

There is reference to extant SPDs, such as the Mid Sussex Design Guide SPD and the Affordable Housing SPD, in various parts of the submitted plan. It is not considered that any modifications are necessary in this regard.

MATTER 2: DUTY TO CO-OPERATE

Issue 1: Whether the Council has complied with the duty to co-operate in the preparation of the Plan?

Duty to Co-operate

21. Have all Statements of Common Ground been provided consistent with the requirement of the Framework and the associated Planning Practice Guidance?

An up-to-date Duty to Co-operate Statement (Document DC1) was produced in July 2024 and extensive Statements of Common Ground with other parties are provided within the evidence base. This includes SOCGs with surrounding Local Authorities and Statutory Consultees. The SOCGs are considered to be consistent with the requirements of the framework and PPG in this regard.

22. Has the Council co-operated with the relevant local planning authorities, and appropriate prescribed bodies, in the planning of sustainable development relevant to cross boundary strategic matters? If so, who has the Council engaged with, how, why, and when, with particular reference to the ability to influence plan making and the production of joint evidence and meeting unmet needs?

This is a matter for the council to respond on but document DC1 provides up-to-date evidence of extensive co-operation with prescribed bodies.

23. Specifically, in relation to Mid Sussex Council, what are the matters of cross boundary strategic significance which require co-operation, and how have these matters been identified?

The strategic priorities of cross boundary significance are considered to include the following matters:

- Meeting Housing Need
- Jobs and employment
- Transport
- Infrastructure
- Environment
- Water Neutrality
- Ashdown Forest
- Gatwick Airport
- High Weald Area of Outstanding Beauty

Document DC1 sets out the approach taken to these matters and demonstrates ongoing and effective engagement in this regard.

24. In considering such matters, including the timing, has the Council co-operated with those identified above, constructively, actively, and on an on-going collaborative basis throughout the preparation of the submission plan?

As set out above, the council has adequately referenced this within document DS1.

25. I am aware of a number of cross boundary groupings which involve Mid Sussex on a sub-regional level as set out in the various Statements of Common Ground. As a consequence of the Council's legal duty to co-operate, how has the effectiveness of plan-making activities relating to the identified strategic matters been maximised to enable deliverable, effective policies? In doing so, has joint working on areas of common interest been undertaken for the mutual benefit of Mid Sussex Council and its neighbouring authorities with tangible outputs?

This is a question for the council to respond on.

26. Has Mid Sussex Council been diligent in making every effort to meet cross boundary strategic priorities, including addressing potential unmet development needs arising from neighbouring authorities as referenced in Policy DP5 of the Mid Sussex District Plan 2014-2031 and as requested by neighbouring authorities?

Document DS1 sets out the way in which the council has sought to accommodate the unmet housing need in the North Western Housing Market Area.

Submission Draft policy DPH1 sets out the housing requirement and sources of housing supply over the Plan period. This indicates that there will be an oversupply of 996 dwellings, for resilience to housing delivery in Mid Sussex, should any sites not be delivered. This provision also serves as a contribution towards unmet need arising in the North Western Housing Market Area.

The Housing Need Topic Paper (2024) (document H5) provides commentary on the housing requirement and housing supply as a result of the change to the Standard Method (March 2024) and an updated Housing Land Supply to April 2024. The topic paper also takes into account proposed modification to the end date of the Plan. Collectively these updates would increase the oversupply to 1,042 dwellings.

27. Notwithstanding the Housing Needs Statement of Common Ground (SOCG) (DC4), signed by the Northern West Sussex authorities, what is the rationale for the

prioritisation of meeting the unmet needs of the Northern West Sussex HMA over those of the unmet needs of other relevant HMAs?

The primary Housing Market Area for MSDC is the North West Sussex Authorities of Crawley, Horsham and Mid Sussex. The SOCG between the North West Authorities (DC4) establishes a priority for meeting housing need which is considered highly appropriate and is agreed between all parties.

28. Are there strategic matters which have not been adequately considered on a cross boundary basis? If so, what are they and how is this the case?

It is not considered that any strategic matters have not been adequately addressed.

29. Specifically, has the Duty to Co-operate been discharged in a manner consistent with Paragraphs 24- 27 of the Framework?

Yes, it is clear that the plan is sound in this respect.

MATTER 3: VISION, OBJECTIVES AND SPATIAL STRATEGY

Issue 1: Whether the Spatial Vision and Objectives for Mid Sussex Council are justified, effective, consistent with national policy and positively prepared?

30. Does the Spatial Vision for the 2018 District Plan remain relevant?

As the council has set out in the plan the 2018 District Plan spatial strategy focused development towards the three towns (Burgess Hill, East Grinstead and Haywards Heath) and encouraged proportionate growth at other settlements to meet local needs and support the provision of local services. This spatial strategy informed the location of allocations within the 2018 District Plan and subsequent Site Allocations DPD.

The plan as submitted seeks to continue the development already planned for and is consistent with the 2018 district plan in that regard. The new plan then seeks to review the existing spatial vision and applies relevant changes to ensure the future needs of the district in respect of sustainable development can be met throughout the plan period.

31. Are the Plan objectives which have been identified relevant; justified; and consistent with National Policy?

Yes, the plan is considered to comply with the requirement of paragraph 35 of the framework in this regard.

32. Is the Plan period justified, effective and consistent with national policy in particular paragraph 22 of the Framework? Should it be extended, if so, why?

Proposed Modification M1, as set out in document DP2 seeks to extend the plan period to 2040. This is considered consistent with paragraph 22 of the framework in this regard.

Issue 2: Whether the Spatial Strategy is justified, positively prepared, effective, and consistent with national policy?

33. Chapter 6 of the Plan relates to the District Plan Strategy. However, there is no explicit strategy within the Plan as submitted rather four principles and a distribution of development based on commitments, and existing and proposed allocations. Is there an overall spatial strategy which sets out the pattern, scale and design quality of places and makes sufficient provision for development and infrastructure as required by paragraph 20 of the Framework? If so, how would this strategy influence decision-making, and has it been positively prepared, justified, and effective?

Chapter 6 sets out the overall spatial strategy in how each of the four principles would be applied and how they met the strategic policies of the plan. The existing spatial strategy from the 2018 plan remains relevant and is supplemented by the site allocations within the plan as submitted.

34. Does the spatial strategy make the effective use of land including previously developed land?

Chapter 6 sets out the approach to making effective use of land and this is supported by the urban capacity study which has been reflected in individual policies. The approach is consistent with chapter 11 of the framework and seeks to promote previously developed land. It should be noted that Mid Sussex is a largely rural district with only approximately 12% of the land within a designated Built-Up Area boundary. Consequently, opportunities for utilising brownfield land to meet the housing needs of the district are relatively limited.

35. Is this strategy sufficiently clear to decision-makers, developers, and local communities as to where the majority of new development including infrastructure will be located? Is it consistent with the policies of the Plan?

The plan sets out that the strategy is seeking to extend existing less sustainable communities, which currently have the benefit of only limited services, with development of a scale which can provide the infrastructure and services which will not only meet the needs of the new community, but those of the existing community as well.

This can be achieved by developing a single large site providing facilities and services on site; or a combination of smaller sites, that on their own would not deliver sustainable development, but collectively could support new schools, neighbourhood centres and employment opportunities.

36. How were the settlements defined as different categories and how did the Council decide on the scale and level of growth attributed to the different areas/settlements in the Plan? Is this justified?

The categories of the existing settlements were clearly defined as part of the 2018 Local Plan. Consideration of the spatial approach to the level of growth to the different settlements and areas was assessed within the Sustainability Appraisal which sets out different options to growth.

37. How does the spatial strategy and the distribution of development relate to neighbouring settlements outside of the District such as Crawley to the north?

The plan acknowledges the inter-relationship with the district and neighbouring settlements such as Crawley and this has been addressed through the DtC, and assessed through the Sustainability Appraisal, as considered in other matters under the examination.

38. Is the strategy and distribution of development consistent with paragraph 105 of the Framework which states that the planning system should actively manage patterns of growth and focus significant development in locations which are, or can be made sustainable and paragraph 124 of the Framework which references the need to achieve appropriate densities so as to optimise the use of land in their area?

It is considered the plan actively focuses growth in a sustainable way towards the most sustainable locations. The plan sets out a key driver for the effective use of land as per the thrust of the framework.

39. How have the constraints within the District, such as the High Weald Area of Outstanding Natural Beauty and the setting of the South Downs' National Park influenced the strategy of the Plan?

Protection of the High Weald AONB is a key principle of the plan and also the existing 2018 district plan. The protection of valued landscapes is a key strategic objective which is considered extensively as part of key policies and within the sustainability appraisal.

Consideration of the setting of the South Downs National Park is also extensively referenced within the plan and policy DPC5 specifically deals with this matter.

40. To what extent was the preferred combination of options 1 and 2 chosen on the basis of a justified and proportionate evidence base?

The SA sets out detail appraisal of options 1 and 2 against the key SA objectives. The plan is supported by an extensive evidence base to support the approach taken.

41. Does the spatial strategy look sufficiently further ahead, particularly in relation to larger developments that go beyond the Plan period, such as DPSC1: Land to the West of Burgess Hill/ North of Hurstpierpoint; DPSC2: Land at Crabbet Park and DPSC3: Land to the south of Reeds Lane, Sayers Common?

This is a matter for the council to respond on.

42. What reasonable alternative options were considered as part of the Plan's preparation and why were they discounted?

Section 4.2 of the Regulation 19 SA (Document DP7) sets out the reasonable alternatives in terms of spatial options for the plan with five separate options identified in total.

Section 6.3 of the SA then goes on to consider reasonable alternatives in respect of other potential sites and section 6.4 assesses these against the SA objectives.

43. Are any main modifications necessary for soundness, if so, why?

No, it is not considered that any modifications are necessary to make the plan sound.

MATTER 4: TRANSPORT

Issue 1: Whether the Plan is justified, effective and consistent with national policy in relation to transport?

44. Is the Plan consistent with Circular01/2022 Strategic Road Network and the Delivery of Sustainable Development and paragraphs 104- 109 of the Framework? How has the Council considered transport issues from the earliest stages of plan making and development proposals particularly given that opportunities to maximise sustainable transport solutions may vary between urban and rural areas?

The evidence base for the plan contains a detailed and iterative series of documents which demonstrate the integration of transport matters from early stages of the plan making process.

45. Following the Regulation 19 consultation on the Plan which is the subject of the examination, National Highways determined that due to potential severe impacts

on the Strategic Road Network (the M23 and the A23) the Council would either have to a) consider a different pattern of growth; b) commit to significant highway improvements to the M23 and A23; or c) commit to a more ambitious package of sustainable transport, travel demand management and behaviour change measures and interventions accompanied by a robust 'monitor and manage' strategy and approach. What has been the Council's response to this? Are any consequential main modifications required to the spatial strategy, policies, and timing of delivery of development over the lifetime of the development plan?

This is a matter for the council to respond on. However, it is clear that the development of site DPA15 would not place any severe impact on the SRN.

46. Is the transport evidence which supports the submission plan including any assumptions, such as home working rates, robust, justified, and is it consistent with national policy?

The Transport Scenarios as tested within the evidence base set out assumptions on home working and other matters as required by national policy.

47. Specifically, to what extent is the central tenet of the Plan, of 20-minute neighbourhoods and local living, justified, and effective in the context of a predominantly rural district and a development strategy which is to identify sites in areas which are to improve the sustainability of existing settlements including those falling within lower tier categories? Is there a tension between substantial low-density development as referenced in the Local Plan Viability Study (VA) (IV2) and a successful 20-minute neighbourhood?

This is a matter for the council to respond on.

48. What mechanisms would be required to achieve the proposed improvements set out within the individual allocations and would they be enough to prevent the transport impacts identified? Would the delivery of the sites be viable so as to be able to support the required mitigation requirements over the long term? Is the cost of any mitigation requirements reflected in the VA. Moreover, would these sites become genuinely sustainable, or given their locations, would they remain heavily reliant on the private car? For example, I note that the cycle routes within the identified Sustainable Communities sites would only lead to a reduction in highway traffic of 1-2%?

It is considered that the delivery of site DP15 would lead to development that is genuinely sustainable and would not lead to further reliance on private car.

49. National Highways is clear that Road Investment Strategy (RIS) funding would not be available. What certainty is there that sufficient mitigation would be capable of being achieved either through the reduction of private car journeys or funded highway improvements? How could the ‘monitor and manage’ approach be integrated into the Plan and how would it impact on its deliverability?

This is a matter for the council to respond on.

50. Taken together, are the policies of the Plan including the site allocations and policies DPT1; Placemaking and Connectivity, DPT2: Rights of Way and Other Recreational Routes; DPT3: Active and Sustainable Travel together with DPI1: Infrastructure Provision; DPI2: Planning Obligation; DPI3: Major Infrastructure Projects and DP18: Viability justified, effective and consistent with national policy in relation to transport so as to avoid an unacceptable impact on highway safety? Would they ensure that the residual cumulative impacts on the road network would not be severe? How would the Infrastructure Delivery Plan be effective in supporting the above policy requirements?

This is a matter for the council to respond on.

51. Are any main modifications necessary for soundness, if so, why?

No, it is not considered that any modifications are necessary to make the plan sound.

MATTER 5: FLOOD RISK

52. How has the preparation of the Plan and its policies been informed by paragraphs 159 to 165 of the Framework?

Flood risk is considered extensively within the plan and its policies including policy SPD4 which deals exclusively with flood risk and drainage.

The allocation of site DP15 would have no impact on flood risk or drainage and surface water can be adequately dealt with through the provision of Sustainable Drainage Systems on the site.

53. Have the strategic policies of the Plan as submitted, including the Plan’s spatial strategy; identification of sites as Sustainable Communities; and other smaller housing sites been supported by up-to-date strategic flood risk assessments, including a Level 2 Strategic Flood Risk Assessment?

The local plan is supported by an extensive evidence base in relation to flood risk including a level 1 (Document ENV12) and level 2 SFRA (Document ENV15).

54. What is the relevance of the geology of the district to flood risk including its mitigation?

This is a matter for the council to respond on.

55. Are all of the relevant policies within the Plan consistent with national policy?

Yes, it is considered that all policies relating to flood risk are consistent with national policy.

56. Are any main modifications necessary for soundness, if so, why?

No, it is not considered that any modifications are necessary to make the plan sound.

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

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

As set out, the council proposes a modification to the plan period to 2040 in order to be consistent with national policy in this regard.

58. To determine the minimum number of homes required, housing policies should be informed by the Government's local housing need methodology. As such, are the inputs used to determine the level of housing needed within the Plan appropriate?

The Housing Need and Requirement Topic Paper (July 2024) (document H5) sets the Council's considerations when determining the Housing Need and Housing, drawing together the conclusions of various published evidence base studies, processes and accompanying documents such as the Sustainability Appraisal.

The plan was subject to regulation 19 consultation prior to March 2024 and therefore will be examined under the September 2023 NPPF version as established in the transition arrangements set out in paragraph 230 of the most recent version of the framework.

59. Are there exceptional circumstances to suggest that an alternative approach be taken? If so, what are they, and how would they impact on housing need? Is the Strategic Housing Market Assessment 2021 (H1) up to date and justified?

The topic paper (H5) sets out detailed consideration of whether exceptional circumstances exist to justify a housing need higher than the standard method and concludes that there is no evidenced justification which would support an alternative approach.

60. What are the implications, if any, of the Gatwick Airport's proposed extension and DCO on the demand for housing? Does the OAN set out within the submission Plan of 19,620 remain appropriate?

This is a matter for the council to respond on.

Affordable housing

61. Is the figure of 470 affordable homes per annum set out in the SHMA (H1), split between rented and owned homes, subject to S106 control, based on appropriate evidence?

Paragraph 12.9 of the SHMA (H1) states that it is not recommended that the Council has a rigid policy for the split between social and affordable rented housing, although the analysis is clear that both tenures of homes are likely to be required. The exact split should be subject to negotiation with the housing team at the council on a site by site basis.

Gypsies and Travellers and Travelling Showpeople

62. Is the plan clear as to the identified need for additional pitches, including for those who no longer travel, as well as transit sites for Gypsies and Travellers, and travelling show people? Is the April 2022 Gypsy and Traveller Accommodation Assessment (GTAA) (H2) consistent with the December 2023 version of the Planning Policy for Traveller Sites? If not, would this impact on the need for additional pitches?

ABC does not intend to make any submissions in response to this matter.

63. Are there other considerations that are likely to drive an increase in need locally, such as any needs that cannot be met within neighbouring areas?

ABC does not intend to make any submissions in response to this matter.

64. Is the identified need supported by a robust, up-to-date, and credible evidence base consistent with the 'Draft Guidance to local housing authorities on the periodical review of housing needs - Caravans and Houseboats DCLG 11 March 2016'?

ABC does not intend to make any submissions in response to this matter.

Other specialist needs

65. How have the needs of other caravan dwellers and houseboat dwellers been considered within the Council's evidence base?

ABC does not intend to make any submissions in response to this matter.

66. What assessment has taken place of the needs of particular groups by household size, type, and tenure, including self-build and custom housebuilding? What assumptions have been made to calculate the need for specialist housing: for example, housing for older people, and for households with specific needs, to offer a better choice of housing? Are these assumptions justified and consistent with national policy?

ABC does not intend to make any submissions in response to this matter.

Housing Requirement

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?

As set out in policy DPH1, the 996 over supply of dwellings will add resilience to housing delivery in Mid Sussex, should any commitments not be delivered as expected. The Council is fully cognisant of the housing need within the Northern West Sussex Housing Market Area (HMA), which the Strategic Housing Market Assessment (SHMA) concludes is the primary HMA for Mid Sussex. Whilst Mid Sussex can meet its housing need as a result of the allocations set out in DPH1, there is likely to be an unmet need arising in the HMA overall. Any provision over and above meeting Mid Sussex housing need serves as a contribution towards unmet need arising in the Northern West Sussex Housing Market Area in accordance with the agreed priority order.

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 (HNRTP) (H5), and the more immediate housing needs of Crawley, Brighton and Horsham?

As set out, the Housing Need and Requirement Topic Paper (July 2024) (document H5) sets out detailed consideration of whether exceptional circumstances exist to justify a housing need higher than the standard method and concludes that there is no evidenced justification which would support an alternative approach.

69. If so, are there any policies within the Framework that protect areas or assets of particular importance that provide a strong reason for restricting the overall scale, type or distribution of housing, within the plan area; or would any adverse impacts of meeting the Council's OAN and the unmet needs of others significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework as a whole?

This is a matter for the council to respond on.

70. Is the requirement for Older Person's Housing and Specialist Accommodation (DPH4); DPH5: Gypsies, Travellers and Travelling Showpeople and DPH6: Self and Custom Build Housing justified and positively prepared?

ABC does not intend to make any submissions in response to this matter.

71. What is the housing requirement for each designated neighbourhood area?

This is a matter for the council to respond on.

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

It is not considered that any modifications are necessary for soundness in respect of the allocation of site DP15 or in general terms within the plan.

We would look forward to being involved in the relevant sessions of the Stage 1 Hearings as indicated in our previous correspondence to you.

Yours Sincerely



Andrew Black

andrew@andrewblackconsulting.co.uk

(2417 words excluding titles and questions)