



Mid Sussex Local Plan Examination:  
Response to Matter 2  
Haywards Heath Golf Course

**Boyer**

Prepared on behalf of Croudace Homes Ltd | September 24

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**REPORT CONTROL**

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<b>Primary Author</b>	Christopher Roberts / Daniel Gresswell-Nunn
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## 1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Boyer on behalf of Croudace Homes Ltd ('Croudace'), in response to the Inspector's Stage 1 Matters, Issues, and Questions ('MIQs'), in relation to the examination of the submitted Mid Sussex District Plan Review (the 'Local Plan' / 'Plan').
- 1.2 Boyer has prepared this statement in response to 'Matter 2: Duty to Co-operate', as identified in Examination Document ID\_004 – Matters Issues and Questions – Stage 1, published August 2024. It should be read in conjunction with our submissions with respect to the other identified Matters.
- 1.3 The Hearing Statement has been prepared with respect to the promotion of the land at Haywards Heath Golf Course, over which Croudace holds a specific land interest. Our comments respond only to those questions pertinent to our client's interest.
- 1.4 Representations were submitted to the Council's Regulation 19 Consultation on behalf of Haywards Heath Golf Club Ltd., submitted by DMH Stallard. Croudace's interest over the land has been formalised following the Regulation 19 consultation.

## 2. RESPONSE TO MATTER 2: DUTY TO CO-OPERATE

### Issue 1: Whether the Council has complied with the duty to cooperate in the preparation of the Plan?

#### Duty to Co-operate

**Q25. 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?**

- 2.1 Given the Government's proposed amendments to the Standard Method in the current NPPF consultation, the housing need figure for Mid Sussex is set to increase by some +23%. In this regard, the revised Standard Method would be considerably larger than the Plan's currently proposed housing supply. Likewise, the Housing Statement of Common Ground ('SoCG'), signed between the NWSHMA Authorities, was published in July 2024 and does not (by virtue of this timing) take account of the Government's proposed changes to the Standard Method, and the uplift in LHN across the HMA.
- 2.2 Additionally, and as detailed in our response to Question 26 below, the Inspectors examining the Crawley Local Plan also expressed a dissatisfaction that the Plans being prepared in the NWSHMA are coming forward asynchronously, such that it becomes harder to properly plan for unmet housing needs to be addressed strategically. Indeed, the Final Report into the Crawley Local Plan does throw down the gauntlet to the Authorities adjoining the Borough, in calling for "*genuine strategic planning*".
- 2.3 Following this, our recommendation, as set out in our response to Matter 1, is that a 'review mechanism' is introduced within the Local Plan, to set out a specific timeframe for a review of the Plan once adopted, and consequences for not undertaking such a review. This would provide the District with an opportunity to review its housing needs in the context of an updated NPPF and make provision for a greater amount of housing supply as appropriate.
- 2.4 Croudace advocates the Land at Haywards Heath Golf Course as a very credible site that could accommodate a new residential development of approximately 800 homes alongside new community facilities and services to enhance its sustainability. The site is well-placed for selection as a future allocation through an early review of the Plan, to increase the supply of homes and address needs arising in the HMA.

**Q26. 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?**

2.5 Policy DPH1 of the Submission Version Local Plan identifies a LHN figure of 19,620 dwellings, or 1,090 dwellings per annum. Croudace supports the meeting of the LHN housing need in full.

2.6 Nonetheless, the situation in Crawley is pertinent, where the Submission Version Local Plan for that Local Authority suggests an unmet need of some 7,505 homes will arise. Notable is the point raised at paragraphs 26 and 27 of the Crawley Local Plan Inspector's Final Report (dated 06 September 2024), which states that;

*"...there is a general concern regarding potential impacts arising from a lack of coordinated planning for growth around Crawley. Whilst the Gatwick Diamond Local Strategic Statement and West Sussex and Greater Brighton Local Strategic Statement provide a degree of strategic framework for plan preparation these are high-level, non-statutory documents. There is a cogent argument, in our view, that growth in and around Crawley would benefit from genuine strategic planning that could suitably consider growth options and infrastructure at an appropriate level and on a consistent evidence base."*

*"Whilst jointly produced local plans can include strategic policies, there is no obligation to prepare such plans. The Local Development Scheme (LDS) identifies the potential of a Joint Plan, but plan-making within the NWSHMA has been staggered such that there is no obvious point at which plan review for the respective authorities could reasonably coalesce around a timely joint strategic plan. In preparing individual Local Plans across NWS, it is better, in our view, that Crawley's Plan is examined and adopted ahead of Horsham and Mid Sussex in terms of providing certainty around the scale of unmet needs and any infrastructure requirements."*

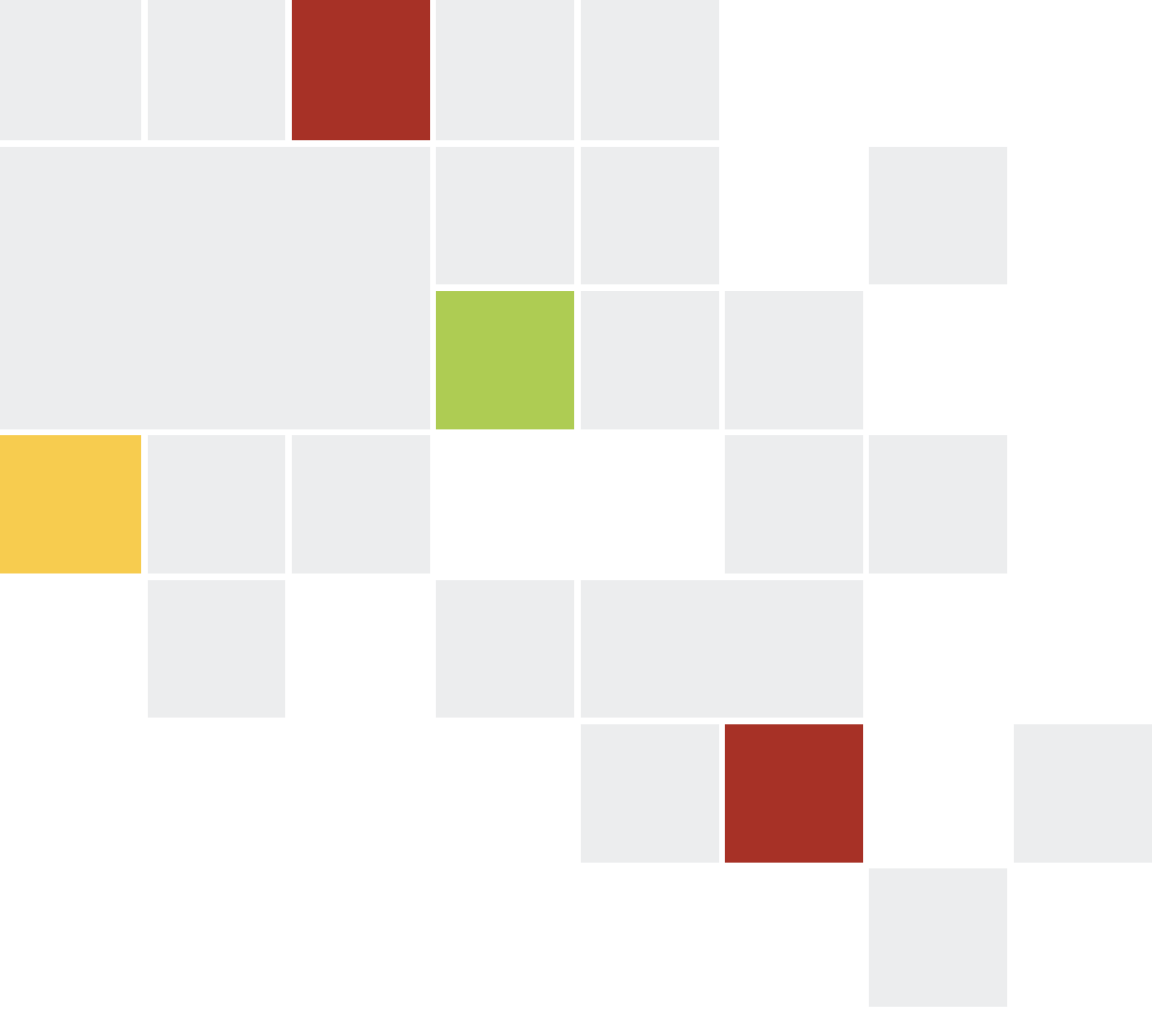
2.7 The very significant levels of unmet need arising in Crawley and the absence of an effective mechanism to coordinate a response to this, is not a desirable outcome. However, as Inspector's Rollings and Spencer note, the examination of Crawley's Local Plan establishes the level of unmet need at this point in time. Albeit it is relevant that the revised Standard Method would (if implemented) increase Crawley's annual LHN figure by some +185 dpa, further increasing the level of unmet need.

2.8 In Croudace's view, this underscores the necessity of embedding (within the Local Plan) a requirement for an immediate review of the Local Plan, to address a share of Crawley's unmet need through additional allocations within Mid Sussex. This will ensure that needs are properly met within the Northern West Sussex (NWS) authorities. An early review of the Plan would also be consistent with the direction of travel articulated through Government's consultation on a revised NPPF.

- 2.9 Mid Sussex is also notably unaffected by the water neutrality constraints that impact adjoining Authorities that fall within the Sussex North Water Resources Zone (SNWRZ). The Sussex North Water Neutrality Study (December 2022) highlights the degree of constraint, with only *circa* 8,000 homes being able to be built within the SNWRZ without increasing the rate of net water abstraction, even when an above standard rate of water efficiency is assumed (85 litres per day, rather than the conventional 110 litres).
- 2.10 Indeed, whilst the SNOWS offsetting project progresses, concerns over water neutrality resulted in Horsham's Submission Version Local Plan (which is currently subject to Examination) identifying a stepped trajectory, which backloads delivery into the latter part of the Plan.
- 2.11 The effect will be that significant and pressing housing needs cannot be addressed as quickly as should be the case. This further reiterates why, in the future, Mid Sussex should be expected to accommodate a share of unmet needs arising in the HM, through an immediate review of the submitted Plan.

**Q27. 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?**

- 2.12 It is noted the submitted Plan sets out that the supply of new homes being planned for includes for some provision against unmet needs arising from neighbouring LPAs. However, the identified supply (i.e., the 'headroom' over the LHN minimum) is presented as having an interchangeable purpose namely providing "resilience" or helping to meet unmet needs. This creates ambiguity, which in turn underlines the necessity for a (forward looking) mechanism for monitoring and apportioning housing delivery to either the meeting of Mid Sussex's own needs or those unmet needs arising within nearby Local Authorities.
- 2.13 Indeed, in relation to Crawley (and to illustrate the point), and in the absence of a specified apportionment and monitoring mechanism, the only way of knowing whether any housing delivered in Mid Sussex could be said to have met unmet needs within the HMA, would be to take stock at the end of the Plan period, in 2039, and take a retrospective view on overall completions vs overall need across the HMA. By 2039, both Mid Sussex and Crawley's local plans would have been subject to at least three reviews per Regulation 10A of the TCPA (1990).
- 2.14 This further highlights the importance of introducing an immediate 'review mechanism' within the Local Plan's policy wording, to push forward the strategic planning approach that the Crawley Local Plan Inspectors are effectively calling for. Indeed, we would hope that the Inspector currently examining the Horsham Local Plan would take a similar perspective to allow for a joined-up approach in light of the Crawley Inspectors' Report.



Crowthorne House, Nine Mile Ride, Wokingham, RG40 3GZ | 01344 753 220  
wokingham@boyerplanning.co.uk | boyerplanning.co.uk

# Boyer