

Mid Sussex District Plan Review Examination

Our ref 65901/01/MS/HBe
Date 27 September 2024
From Lichfields obo Berkeley Latimer

Subject Matter 2: Duty to Co-operate

This hearing statement has been submitted by Berkeley Latimer (BL). BL is promoting the 'Land South of Reeds Lane' (DPSC3) 'Significant Site' for 2,000 homes in Sayers Common.

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

Duty to co-operate

Q21-Q26 inclusive:

1.1 No comment.

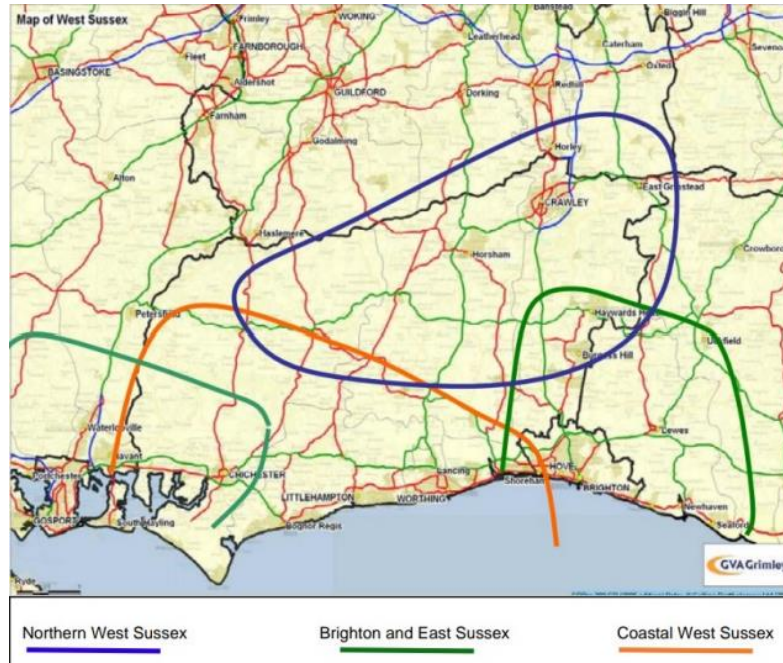
Q27. Notwithstanding the Housing Needs Statement of Common Ground (SoCG) (DC4), signed by the Northern West Sussex authorities, what is the rationale for the prioritisation of meeting the unmet needs of the Northern West Sussex HMA over those of the unmet needs of other relevant HMAs?

1.2 It is for the Council to justify its decision to prioritise the unmet needs of the Northern West Sussex HMA – for which there is currently an unmet need of 9,882 homes¹ – over other HMAs that overlap the district and county more widely (as shown below – extracted from the Council's 'Housing Need and Requirement Topic Paper [H5]'); principally the Coastal West Sussex and Greater Brighton HMAs (with an estimated unmet need of 30,000+ homes combined²).

¹ Paragraph 37, (H5).

² Paragraph 40, (H5).

Figure 1 HMAs Overlapping West Sussex



Source: Page 7, Document H5.

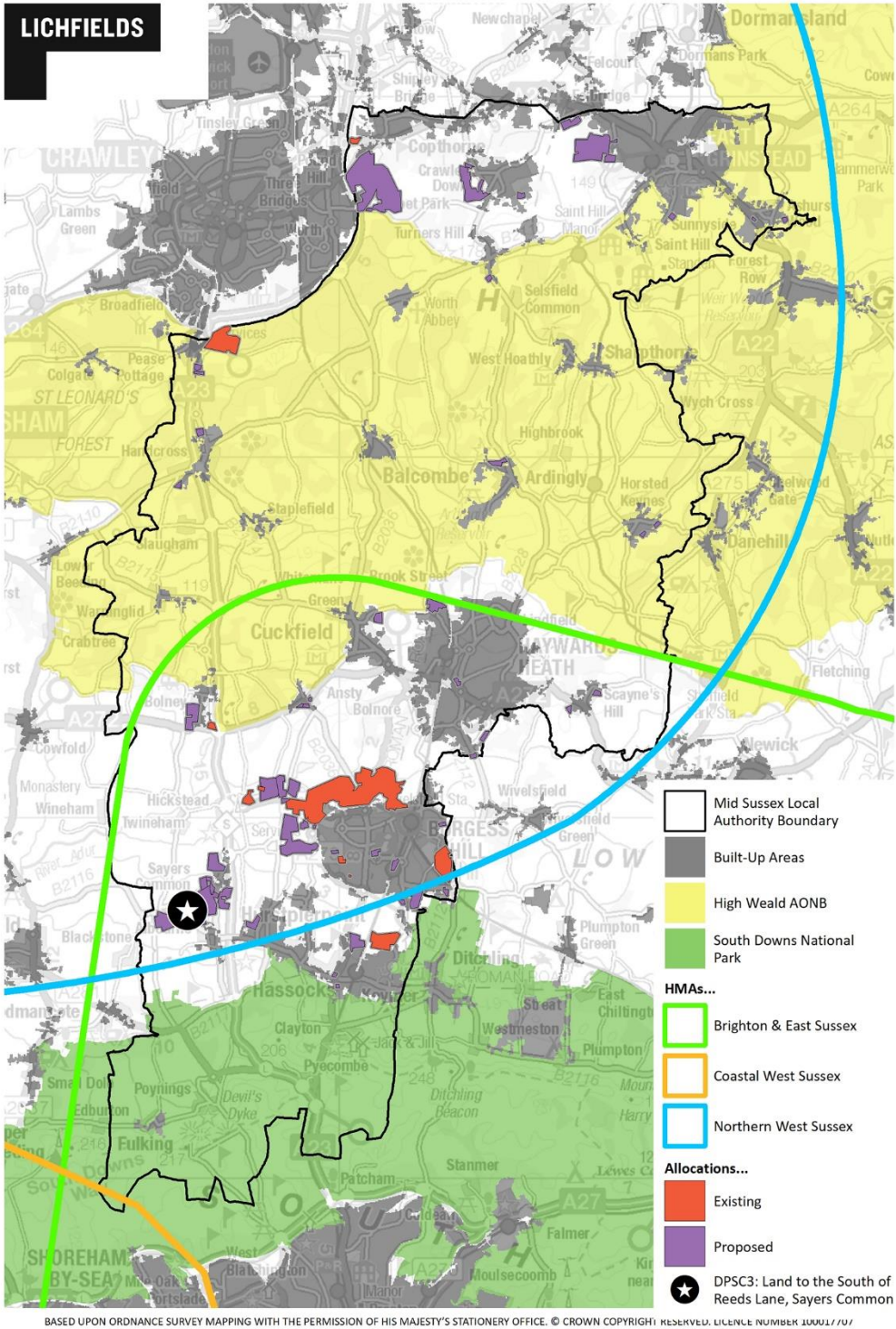
- 1.3 However, linked to our response to Matter 6 (Q68) there are multiple HMAs that overlap within Mid Sussex District (and West Sussex more widely) that have significant levels of unmet needs arising in neighbouring authorities. Therefore, if the Inspector came to the view that the Council did need to make a specific and/or greater contribution to meeting those unmet needs, then this is a matter that can be dealt with via modifications to the plan to make additional allocations (if justified in accordance with a potentially updated wider evidence base).
- 1.4 Taking that point further – and specifically considering this question – if the Inspector also concluded that the Council should potentially make a specific contribution to meeting the unmet needs of the Coastal West Sussex and Greater Brighton HMAs (in addition to its own housing needs and presumably a contribution to the Northern West Sussex unmet needs) then the logical first location to meet those needs would be in the areas of overlap between the HMAs outside the South Downs National Park and the High Weald National Landscape.
- 1.5 Figure 2 below shows a map prepared by Lichfields. This map shows the location of the existing and proposed allocations (in the adopted District Plan and as currently proposed through the plan being examined). It also shows the extent of the two key spatial constraints of the district: the South Downs National Park and the High Weald National Landscape. Finally, it also shows the broad extent of the overlapping HMAs (taken from Figure 1 above). Layering this information over the district – and noting the existing urban areas within it and in neighbouring authorities – it demonstrates that the Council is already

seeking to accommodate the majority of growth in the district within this logical ‘overlap area’ outside the key constraints to meet its growth needs.

- 1.6 In this context, if more sites were needed to meet a specific (or potentially greater) level of unmet needs from both the (1) Northern West Sussex and (2) Coastal West Sussex and Greater Brighton HMAs, then those allocations already within this ‘overlap area’ should inherently be supported. The need to test and potentially allocate more such sites – likely in this broad area – should not undermine the strategic case for those already in the plan as submitted (DP1). Ultimately, this will be a matter for the Council and the Inspector to determine based on any updated evidence as considered necessary.

LICHFIELDS

Figure 2 Adopted and Proposed Allocations in Mid Sussex District (with key constraints)



Source: Lichfields.

Q28-Q29:

1.7

No comment.

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