

Mid Sussex District Council

District Plan Review

Hearings Action Points – AP-013

Duty to CoOperate

Appendix A7:

Unmet Need Requests and Mid Sussex District Council Responses

November 2024





Elmbridge
Borough Council

... bridging the communities ...

Civic Centre
High Street, Esher
Surrey KT10 9SD
01372 474474

contactus@elmbridge.gov.uk
elmbridge.gov.uk

FAO: Chief Planning Officer /
Head of Service with the responsibility for
Planning

Sent via email

contact: Suzanne Parkes
Planning Policy & Strategy
Manager

direct line: [REDACTED]
e-mail: [REDACTED]
my ref: DtC January 2020
your ref:

27 January 2020

Dear Sir/Madam,

Elmbridge Borough Council Local Plan: Duty to Co-operate

Elmbridge Borough Council is currently preparing a new Local Plan that will set out its development strategy and detailed planning policies for the borough up to 2036. As with most Local Planning Authorities (LPAs) in the South East, one of our biggest challenges is meeting our housing need (as set by the Government's standard methodology) against a back drop of environmental and planning constraints.

As part of the Plan's preparation, the Council is exploring options for how its housing need figure can be met. A preferred option has not yet been determined however, as set out in the [Options Consultation 2019](#), it is highly unlikely that there will be sufficient land within the existing built-up areas to accommodate circ. 9,345 new homes in full. Our estimate is that there is sufficient land to build approximately 5,300 new homes; equating to a potential shortfall of land to accommodate nearly 4,000 new homes.

We appreciate that LPAs are at different plan-making stages and others will be in a similar position in terms of responding positively to the challenge of addressing housing need. However, under the 2011 Localism Act and the provisions of the National Planning Policy Framework (NPPF) I am formally asking whether your authority would be able to meet any of Elmbridge's unmet housing need?

I look forward to hearing from you on this important issue and would be grateful for a response by **Monday 24 February 2020**. Please respond to planningpolicy@elmbridge.gov.uk

If you have any queries please do not hesitate to contact Suzanne Parkes, Planning Policy and Strategy Manager on [REDACTED]

Yours faithfully,

[REDACTED]

Kim Tagliarini
Head of Planning Services

Contact:
Alice Henstock
E-Mail: [REDACTED]

Your Ref:
Our Ref:

Date: 14th April 2020

Susan Parkes
Planning Policy and Strategy Manager
Elmbridge Borough Council

By email

Dear Susan,

Elmbridge Borough Council Local Plan

This letter is in response to your letter of 27th Janaury which requests information on the ability of Mid Sussex to assit Elmbridge in meeting its unmet housing need.

Mid Sussex Context

By way of context, it is perhaps helpful to set out the current postion of Mid Sussex in terms of Plan making, housing requirement and its Housing Market Area (HMA).

Mid Sussex sits in the North West Sussex Housing Market area, along with Crawley Borough Council (to the north) and Horsham District Council (to the west). Within the HMA, Crawley is unable to meet its housing need in full and the unmet need arising is currently met by Mid Sussex and Horsham Districts. The southern part of the District is adjacent to the Coastal West Sussex Housing Market area, which includes Brighton and other coastal authorities. This HMA also has a high level of unmet need.

The Mid Sussex District Plan (2014 - 2031) was adopted in 2018. The District Plan has a housing requirement of 16,390. This is made up of the Mid Sussex Objectively Assessed Housing Need of 14,892 dwellings and 1,498 dwellings to ensure unmet is addressed in the Housing Market Area primarily Crawley's unmet need.

District Plan Policy DP4: Housing commits the Council to preparing a Site Allocations Development Plan Document (DPD) to identify additional housing and employment site to ensure the need is meet in full over the Plan period. Work on the Site Allocations is progressing well, and it is anticipated that the document will be submitted for Examination in Summer 2020. The Council is also committed to commencing a review of the District Plan starting in 2021.

District Plan Policy DP5: Planning to Meet Future Housing Need, commits the Council to continuing to work with "all other neighbouring local authorites on an ongoing basis to addresss the objectively assessed need fro housing across the Houins Market Areas, prioritising the Northern West Sussex HMA as the is established as the primary HMA". This policy also commits the Council to working with the Greater Brighton strategic Planning Board to address unmet housing need in the sub region.

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Elmbridge Unmet Housing Need

Until Mid Sussex has progressed with its District Plan review, which will include the establishment of the revised local housing need and the preparation of a robust evidence base to ascertain if and how the revised housing requirement can be met, it is not possible for the Council to confirm if it is able to assist in meeting the unmet housing needs generated by other local authority areas.

If the District Plan review demonstrates that Mid Sussex can sustainably accommodate additional housing beyond its own need, then it would look to assisting authorities within the North West Sussex HMA as the first priority, followed by the Greater Brighton area. It therefore seems very unlikely that Mid Sussex would be able to assist in meeting the unmet need arising from Elmbridge.

I am sorry that we are not able to be more helpful at this stage, but hope the above information clearly sets out our current position.

Yours sincerely



Alice Henstock
Principal Planner
Planning Policy

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INVESTOR IN PEOPLE

Head of Economic Promotion and Planning



Economy & Planning Services



Contact: Elizabeth Brigden

Date: 21 January 2020

Direct Line: [REDACTED]

Email: [REDACTED]

By Email Only

Dear Councillor,

Crawley Borough Local Plan Review 2020 – 2035: Duty to Cooperate

As you may be aware, the Crawley Borough Local Plan Review 2020 – 2035 was approved for publication and submission at the Full Council meeting held on 16 December 2019. The publication consultation will take place for a 6-week period commencing **Monday 20 January until Monday 2 March 2020**.

The Local Plan has been prepared in the context of substantial, positive, ongoing cross-boundary working carried out over the various functional strategic areas in which Crawley forms part and I acknowledge and thank you for this.

The purpose of this letter is to draw your attention to the critical outcomes of the Crawley Local Plan in relation to meeting Crawley borough's objectively assessed development needs. I invite your comments on the information provided and formally request confirmation of the role your authority is able to play in assisting my council in addressing identified unmet development needs under the Duty to Cooperate provisions.

I have extended the range of this letter to those authorities considered to have some degree of strategic planning relationship with Crawley even where administrative boundaries are not shared.

As has been acknowledged in the currently adopted Local Plan (Crawley 2030), in light of Crawley's tight administrative boundaries, the historic Gatwick Airport 'safeguarded' land for a potential southern runway and physical constraints such as aircraft noise contours, flooding, nature conservation constraints and few infill opportunities due to the age and planned nature of the New Town, there is very limited land within the borough for accommodating further development.

There is already long-established, effective joint working within the Northern West Sussex (NWS) Housing Market Area (HMA). Crawley's unmet housing need established from the adopted Local Plan is being addressed by the combined adopted Local Plans within the NWS HMA. Currently, the adopted Local Plans for Horsham and Mid Sussex are anticipated to provide an additional 3,150 dwellings, predominantly to meet Crawley's unmet needs, above their objectively assessed housing needs, over the period from 2020. However, it is acknowledged that through Local Plan Reviews this is likely to change, particularly as the Standard Method increases the housing needs within these districts above those established in the adopted Plans.

The updated total **unmet need**, calculated for the Local Plan Review, against the assessed needs for both housing and employment, arising from within Crawley over the Plan period (2020 – 2035) is:

- Housing: 5,925 dwellings;
- Employment: a minimum 21ha of land for B Use Classes, based on a continuation of past development levels with a constrained employment land supply.

The following sections of this letter set out a summary of Crawley's position in relation to its housing and employment needs. Comments would be welcomed in relation to whether your authority is in agreement with the conclusions reached.

Housing

Crawley's submission Local Plan confirms that the government's Standard Methodology for calculating housing need results in a total housing need for the 15 year plan period (2020-2035) of 11,280 dwellings (based on 752 dwellings per annum).

The draft Local Plan identifies the borough's land supply allows for almost half of this to be met on sites within the borough's administrative boundaries: a minimum totalling 5,355 dwellings (an increase of 549 dwellings since the Regulation 18 Local Plan (July 2019) due to additional sites and increased densities of existing sites following their reassessments). This equates to an annualised average of 357dpa.

However, a stepped trajectory is reflected in the Policy to account for the higher delivery in the early Plan period and the lower anticipated levels towards the end (due to the build out of the last remaining large sites available within the borough):

- Years 1-5 (2020-25): 500dpa
- Years 6-10 (2025-30): 450dpa
- Years 11-15 (2030-35): 121dpa

The council is working hard to maximise capacity within the borough's boundaries, including by introducing extremely high density targets for the Town Centre and accessible locations (Policy CL5) and a series of housing typology policies to positively influence development opportunities within, and immediately beyond, the borough (Policies H3, and H3a-H3g).

This leaves a total unmet need figure of 5,925 dwellings to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.

In addition to the overall unmet housing needs amount, the 2019 Strategic Housing Market Assessment (SHMA) has considered the needs of specific communities within the borough. This has included:

- Those who require affordable housing
- Families with children
- Older people
- Students
- People with disabilities
- People who rent their homes and
- People wishing to commission or build their own homes.

Affordable Housing:

With particular reference to affordable housing, the SHMA has highlighted a net need for 739 affordable homes per year in Crawley (of which 563 dwellings per year are needed as rented affordable housing). As Crawley is only able to meet approximately 50% of its overall housing needs within the borough, even with the 40% affordable housing requirement established by the Local Plan policy (Policy H5) there will be a significant shortfall of affordable housing.

Therefore, where Crawley's unmet housing needs are being met outside the borough boundary, it is requested discussions can take place to explore and agree mechanisms for opportunities for Crawley's affordable housing needs to similarly be met, including through nomination rights being extended to residents on Crawley's housing register. This is particularly, but not restricted to, where housing needs are being met by developments on Crawley's boundaries.

Self and Custom Build Homes:

The SHMA has also highlighted the need for Duty to Cooperate discussions to explore opportunities to meet needs of those who wish to Self- or Custom-Build their own home. As a planned, urban New Town, the potential for meeting the level of development needed is limited within Crawley borough. Also, the high density nature of the majority of Crawley's anticipated delivery, particularly in the Town Centre, is not often appropriate for Self- or Custom-Builders.

The emerging Crawley Borough Local Plan proposes a draft policy approach. However, discussions would be welcomed to consider whether there are opportunities for this to be considered over a wider area (particularly if there are duplicate entries across districts and boroughs).

Employment

In addition to the unmet housing needs, joint working undertaken across Northern West Sussex through the joint commissioning of the recent Economic Growth Assessment (EGA), 2020, has highlighted continued significant anticipated levels of economic growth in the Functional Economic Market Area. Much of the identified growth is associated with the economic strength of Crawley and Gatwick.

The EGA identifies a need for a total of 33 hectares of business land in Crawley over the Plan period, based on a continuation of past development levels which are based on a constrained land supply. As identified by the Employment Land Trajectory, the available business land supply pipeline within Crawley is approximately 12ha, resulting in an outstanding current requirement for 21ha business land.

However, there is potential for a greater level of business growth in Crawley, which uses the 'unconstrained' housing need figure of 752dpa, which identifies a projected B-class business land requirement of 113ha. This level of growth is considered likely to be needed should further major urban extensions to Crawley come forward.

In order to take a proactive approach to addressing economic growth needs in the area, the draft Crawley Local Plan proposes the removal of "safeguarding" of land for a potential southern runway at Gatwick Airport. This land, covering 613ha to the north of Crawley, between the town and the Airport, has instead been designated for an Area Action Plan (AAP).

The AAP will assess the needs for future growth and operational needs of the airport alongside other development needs arising in Crawley, including:

- i. Economic growth;
- ii. Housing (although this will be very limited due to noise constraints from the existing runway);
- iii. Infrastructure;
- iv. Community/recreation facilities; and
- v. Other uses identified through the evidence gathering and consultation on the AAP.

The council is committed to commencing work on the AAP within three months of the adoption of the Local Plan and it may conclude that sites for Strategic Employment Location(s) can be identified within Crawley, should some or all of the AAP land not be required for airport expansion. The AAP will be a future Development Plan Document.

I would welcome a written response from your local authority by **Monday 2 March 2020**, to help formalise the understanding between us with regard to whether your authority is able to assist Crawley in meeting its unmet needs.

Similarly, please let me know if your authority considers there are any other strategic issues not sufficiently covered or ways in which you believe Crawley may be able to assist you in your strategic planning needs.

Please contact me or my officer, Elizabeth Brigden, should you have any questions or require further clarification with any of the content included above.

I look forward to continuing to work with you in the future to seek positive solutions to these challenging strategic issues.

Yours Sincerely,



Cllr. Peter Smith
Cabinet Member for Planning and Economic Development

Contact:

Councillor Andrew MacNaughton [REDACTED]
email: a [REDACTED]

Your Ref:

Our Ref: AMN/RS

Date:

2nd March 2020

By e-mail only
forwardplans@ Crawley.gov.uk

Dear Councillor Smith,

Crawley Local Plan Review 2020 – 2035 –Duty to Cooperate

Thank you for your letter of 21st January 2020, in which Crawley Borough Council has asked for this Council's view on several matters, including the role Mid Sussex may have in assisting Crawley Borough Council in addressing identified unmet development needs under the Duty to Cooperate provisions. Please note that I will be responding to your Local Plan Regulation 19 Consultation (which started on 20 January) in a separate letter.

Mid Sussex District Council is committed to working jointly and proactively with neighbouring authorities to address identified development needs. This commitment is set out in Policy DP5: Planning to Meet Future Housing Need of the Mid Sussex District Plan and is reflected in the ongoing cross council working between Horsham, Crawley and Mid Sussex. As part of this there is ongoing work over the preparation of an updated Statement of Common Ground between Horsham and Crawley Councils given our joint housing market area (HMA) and functional economic market area (FEMA).

In your letter you asked for confirmation of the role Mid Sussex can play in meeting unmet housing needs; if Mid Sussex could help meet the needs of specific communities including affordable housing, and self-build/custom build housing; comments on the evidence base regarding quantum of unmet needs; and Mid Sussex's views on the proposed approach to delivery of a significant level of employment development on the land previously safeguarded for a southern runway at Gatwick Airport.

I have addressed each of these matters in turn below.

The Role of Mid Sussex in Meeting Unmet Housing Needs

The Mid Sussex District Plan (2014 - 2031) was adopted in 2018. The District Plan has a housing requirement of 16,390. This is made up of the Mid Sussex Objectively Assessed Housing Need of 14,892 dwellings and 1,498 dwellings primarily to address Crawley's unmet need. Horsham District Council also commits in its adopted Local Plan to make an annual contribution towards the current unmet need for Crawley. Therefore, in the current adopted plans there is a commitment to assisting with the delivery of the previously assessed unmet need for the North West Sussex area.

Working together for a better Mid Sussex

Notwithstanding this principle, there are a number of significant constraints to development in Mid Sussex. In particular, Mid Sussex needs to ensure that there is no harm from development on the integrity of the European Habitat sites in the Ashdown Forest. The Inspector into the Mid Sussex District Plan agreed to an average requirement of 876 dwellings per annum (dpa) up to 2023/24 with a step to 1,090 dpa in the latter part of the Plan period, subject to there being no harm to the integrity of the Ashdown Forest. Indeed the Inspector made clear that the delivery of the amount of housing above 876 dpa must be subject to further Habitats Regulations Assessment (HRA). In order to ensure delivery of the housing requirement, Mid Sussex is preparing a Site Allocations Development Plan Document (the Sites DPD) to identify additional housing and employment sites to ensure the need established in the adopted District Plan is met in full over the Plan period. Work on the Site DPD is progressing, and it is anticipated that the document will be submitted for Examination in Summer 2020. This work must be completed to provide certainty over the allocation of sufficient deliverable sites to meet both this Council's need and help meet Crawley's unmet need to 2031.

Going forward, District Plan Policy DP5: Planning to Meet Future Housing Need, acknowledges that the three adopted Local Plans within the HMA (Crawley, Horsham and Mid Sussex) follow different time periods. Crawley's Local Plan expires a year before Mid Sussex's Plan and its review is taking place ahead of work by Mid Sussex to review its District Plan. As such, the adopted Mid Sussex District Plan only addresses unmet need up to 2031 and any future unmet need at Crawley has yet to be established or tested.

Whilst the review of the Mid Sussex District Plan will seek to address any further unmet development needs arising within the Housing Market Area this must be secured through the proper plan making process i.e. through the review of the District Plan. Such a process will establish the revised local housing needs and the preparation of a robust evidence base to ascertain if and how these needs can be met, including an HRA to test the impact on the Ashdown Forest. At this stage options and capacity for development beyond 2031 in Mid Sussex have not been tested and therefore it is not possible to confirm the role which Mid Sussex could play in assisting Crawley.

Mid Sussex confirmed through its examination that the District Plan Review would start in 2021, with submission to the Secretary of State by 2023. However, it is the Council's intention that the review should start in 2020/21 – bringing the review period forward by a year.

Crawley's Conclusions Regarding Unmet Housing Need

In your letter you also invite comments on the information provided to support the Crawley Local Plan's position regarding the level of unmet housing need and, on the conclusions reached.

I am aware that Crawley Borough is still preparing additional evidence to support its Plan (including the Transport Study and the Viability Study) which may have implications for the level of unmet needs identified and therefore comments below are made based on the current evidence base.

Mid Sussex has been kept informed of the updates to the Crawley and Horsham commissioned 'Strategic Housing Market Assessment', as part of the Council's continued joint working on housing matters. As a result, it is accepted that the total housing need in Crawley is 11,281 dwellings to 2035.

Mid Sussex notes and welcomes the additional work Crawley has undertaken since the publication of its draft Local Plan and welcomes the additional sources of housing supply (through increasing densities on sites and the identification of other sites) which has resulted in identification of a supply of a further 550 additional units.

Mid Sussex supports policies CL4 and CL5 which relate to making effective use of land. The Council welcomes the fact that Crawley is exploring mechanisms to increase housing supply. However, Mid Sussex considers that Crawley needs to provide additional evidence to demonstrate fully that all opportunities to increase capacity in Crawley have been taken. In particular it would be helpful if Crawley could set out the assumptions behind the capacity of Opportunity Sites (Policy TC3); assumptions behind the density policy (Policy CL5); that all opportunities for estate regeneration have been explored; and assumptions around the use of existing employment land and other uses which could be relocated onto the formally safeguarded land at Gatwick Airport (which I turn to in more detail below).

Affordable Housing

I note your request to explore and agree mechanisms for opportunities for Crawley's affordable housing needs to be met outside of the Borough, including for nomination rights to be extended to residents on Crawley's housing register.

You will appreciate that Mid Sussex's immediate priority is to meet the significant affordable housing needs of those who live in Mid Sussex. The assessed need for affordable homes each year in this district is 258 dpa. Therefore it is very difficult for the Council to meet this need and as a result the Council has a record number of families in temporary accommodation.

Self and Custom Build Housing

I note the concerns which you have set out regarding the opportunities in Crawley to deliver self and custom build homes.

This Council cannot commit to meeting any of Crawley's unmet need regarding this specific aspect of specialist housing provision until its own District Plan review is completed. However, I agree that discussions over processes regarding self-build registers would be helpful, particularly so that we can understand the actual level of demand given the likelihood of duplicate entries across districts and boroughs.

Crawley's Conclusions on Employment Need

Crawley, Horsham and Mid Sussex have worked collaboratively to understand employment needs in the FEMA through the joint commissioning of the Economic Growth Assessment (EGA). The methodology and outcomes were jointly agreed and therefore I can confirm Mid Sussex's support for the evidence base material. Given the anticipated level of housing delivery in Crawley it is also accepted that there is an outstanding requirement for 21 ha of business land.

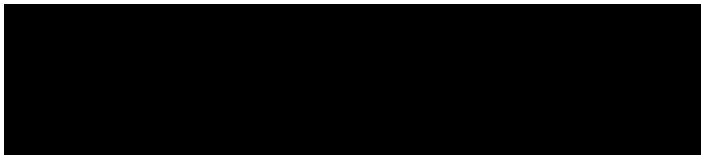
Mid Sussex notes that the level of employment land required would increase if Crawley delivered more housing although it is recognised that this is unlikely to be in the region of the 113ha of employment need cited in your letter. In addition to meeting Mid Sussex's employment needs, we are actively pursuing the development and delivery of a sub-regional Science and Technology Park which could contribute towards meeting unmet needs within the FEMA and could help to meet additional need should Crawley deliver further housing.

Mid Sussex supports the intention of the new Policy SD3 which makes provision for the preparation of an Area Action Plan (AAP) for the area of land to the south of Gatwick Airport that has historically been safeguarded to accommodate the possible construction of an additional runway and associated facilities. At 613ha the area of land is significant and would be able to accommodate the 21ha of unmet need for employment in Crawley whilst also accommodating other uses. For example, opportunities should be explored for the relocation of existing pockets of employment elsewhere in Crawley to this area to create an enhanced employment offer, thereby releasing additional sites for housing. In view of the new opportunities which Policy SD3 provide Mid Sussex would therefore suggest Policy EC1: Sustainable Economic Growth is revisited to allow for a more flexible approach towards the relocation of employment areas to the safeguarded land.

Next Steps

Mid Sussex welcomes the opportunity for further discussion with Crawley on these matters. My officers will continue to work with you in a positive manner.

Yours sincerely



Councillor Andrew MacNaughton
Cabinet Member for Housing and Planning



WORTHING BOROUGH COUNCIL

Planning and Development

Sally Bloomfield
Divisional Leader
Planning and Economy
Mid Sussex District Council

BY EMAIL

29th January 2021

Dear Sally,

Re: Submission Draft Worthing Local Plan – Duty to Co-operate

As you are aware, after several years of preparation and two rounds of consultation you will have been notified that the Submission Draft Worthing Local Plan (WLP) Regulation 19 version has been published. The eight week consultation period runs between 26th January and 23rd March. The Plan and all associated evidence can be viewed here:

<https://www.adur-worthing.gov.uk/worthing-local-plan/>

As with most local planning authorities in the South East, one of our biggest challenges is meeting our housing need (as set by the Government's standard methodology) against a back drop of environmental constraints and a severe lack of available land. Graphics incorporated within the WLP (page 45) clearly illustrate the highly constrained nature of the Borough and the lack of land for expansion. In fact, of the nine remaining potential development sites around the edge of the existing built up area boundary 6 are allocated for development within the Plan.

In addition to the allocation of edge of town sites, the Plan allocates 9 key regeneration sites within the town and seeks to deliver a significant uplift in residential densities across the Borough. Further measures to increase the supply of housing include: Council intervention to unlock some key town centre sites; the approval for the significant intensification of a number of town centre schemes; the granting of planning permission of two edge of town greenfield sites in advance of the adoption of the WLP; and the establishment of a Major Projects Team to drive and facilitate delivery. These and other actions are explained in more detail within the WLP and the Council's evidence base (particularly the Housing Implementation Strategy).



The WLP concludes that a realistic housing capacity figure for the borough from 2020 to 2036 is a minimum of 3,672 dwellings (230 dw pa). This housing target is a 'policy-on' figure based on the level of housing that can be delivered within the Plan period, having regard to the identified constraints and development capacity. This delivery rate is significantly higher than the requirement that was previously set for the borough in the South East Plan (200 dw pa) when actual housing needs were not dissimilar to the current figures.

Despite taking a very positive approach to development, the delivery rate for housing will fall significantly below the levels of housing need identified (14,160 dwellings). Approximately 26% of the overall housing need will be met and this would result in a shortfall in housing delivery over the Plan period of 10,488 dwellings. Whilst acknowledging that this is a very high level of unmet need the Council has robust evidence to demonstrate how all options to reduce this figure and increase the rate of development have been exhausted. Put simply, the tightly drawn boundary around the Borough and lack of available land means that there is simply no way that a higher proportion of development needs can be delivered in a sustainable manner.

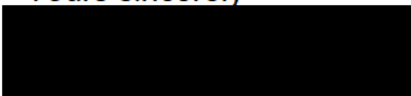


We appreciate that Districts and Boroughs within the sub-region are at different plan-making stages. We also understand the very real pressure you have in meeting your own needs, as has been accepted by various Planning Inspectors when Local Plans within the sub-region have been examined in recent years. This is the key reason why there is collective understanding within the West Sussex and Greater Brighton Strategic Planning Board of the importance of making real progress on Local Strategic Statement 3 (LSS3) in the coming months.

The work to progress LSS3 will be crucial in demonstrating a robust and agreed approach across the sub-region when the next round of Local Plan are examined. However, under the 2011 Localism Act and the provisions of the National Planning Policy Framework (NPPF) I am writing to you now to formally ask whether your authority would be able to meet any of Worthing's unmet housing need? I look forward to hearing from you on this important issue and would be grateful for a response by Tuesday 23rd March.

You will be aware of the work that has been undertaken between respective authorities to address the Duty to Co-operate in recent years. As part of this process, officers from our Planning Policy Team have been liaising with officers from your authority throughout the preparation of the WLP and in the lead up to the Regulation 19 stage consultation. Another round of meetings will be set up between those officers at the start of March. This will provide an opportunity to discuss this request or any other queries you may have before the end of the consultation period. It will also allow for a discussion about the Statement of Common Ground that we would like to have in place between our respective authorities before the end of April when we formally submit the WLP for Examination.

If you have any queries please do not hesitate to contact me or Ian Moody (Planning Policy Manager – Worthing) on 01273 263009 / ian.moody@adur-worthing.gov.uk

Yours sincerely


James Appleton
Head of Planning and Development
Tel: 
e-mail: 

Contact:

Planning Policy, Telephone: 0 [REDACTED]
E-mail: [REDACTED]

Your Ref:

Our Ref: Submission Draft Worthing
Local Plan

Date: 23rd March 2021

[REDACTED]

By e-mail only

Dear James,

Submission Draft Worthing Local Plan – Duty to Cooperate

Thank you for your letter of 29th January 2021, in which Worthing Borough Council has asked for this council's view on several matters, including the role Mid Sussex may have in assisting Worthing Borough Council in addressing identified unmet development needs under the Duty to Cooperate provisions. Please note that I will be responding to your Local Plan Regulation 19 Consultation (which started on 26th January) in a separate letter.

Mid Sussex District Council is committed to working jointly and proactively with neighbouring authorities to address identified development needs. This commitment is set out in Policy DP5: Planning to Meet Future Housing Need of the Mid Sussex District Plan.

In your letter you asked for confirmation of the role Mid Sussex can play in meeting unmet housing needs.

I have addressed each of these matters in turn below.

The Role of Mid Sussex In Meeting Unmet Housing Needs

The Mid Sussex District Plan (2014 - 2031) was adopted in 2018. The District Plan has a housing requirement of 16,390. This is made up of the Mid Sussex Objectively Assessed Housing Need of 14,892 dwellings and 1,498 dwellings primarily to address Crawley's unmet need. Horsham District Council also commits in its adopted Local Plan towards making an annual contribution towards the current unmet need for Crawley. Therefore, in the current set of adopted plans, the three authorities within the Northern West Sussex Housing Market Area can demonstrate that housing need is met.

Notwithstanding this principle, there are a number of significant constraints to development in Mid Sussex. In particular, and as you will be aware, Mid Sussex needs to ensure that there is no harm from development on the integrity of the European Habitat sites in the Ashdown Forest.

The Inspector for the Mid Sussex District Plan agreed to an average requirement of 876 dwellings per annum (dpa) up to 2023/24 with a step to 1,090 dpa in the latter part of the Plan period subject to there being no harm to the integrity of the Ashdown Forest. Indeed, the Inspector made clear that the delivery of the amount of housing above 876 dpa must be subject to the findings of further Habitats Regulations Assessment. In order to ensure delivery of the housing requirement, Mid Sussex is preparing a Site Allocations Development Plan Document (DPD) to identify additional housing and employment sites to ensure the need established in

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the adopted District Plan (including provision for the unmet need in Crawley) is met in full over the Plan period. Work on the Site Allocations is progressing and has been submitted for Examination with Examination hearings anticipated to take place in spring 2021. This work must be completed to provide certainty over the allocation of sufficient deliverable sites to meet both this authority's need and help meet Crawley's unmet need to 2031.

Mid Sussex District Council has just commenced early work on reviewing its adopted District Plan. This is scheduled for adoption in 2023.

Whilst the review of the Mid Sussex District Plan will seek to address any further unmet development needs arising within the sub-region this must be secured through the proper plan making process i.e. through the review of the District Plan. Such a process will establish the revised local housing needs and the preparation of a robust evidence base to ascertain if and how development needs can be met, including an HRA to test the impact on the Ashdown Forest.

As the work is at a very early stage, options and capacity for development beyond 2031 in Mid Sussex have not been tested. Therefore, it is not possible to confirm whether Mid Sussex could assist in contributing towards the unmet housing need in Worthing.

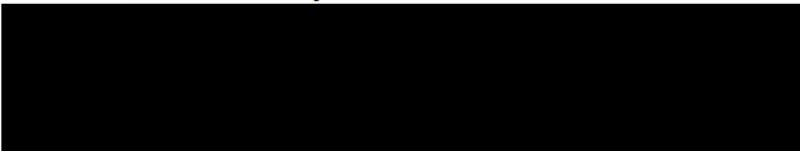
However, it is important to note the primary housing market area for Mid Sussex is the Northern West Sussex HMA which includes Crawley and Horsham. The Regulation 19 version of Crawley's Local Plan Review shows an unmet need of 6,680 dwellings. If the preparation of the District Plan Review indicates that Mid Sussex is able to assist with meeting unmet housing need from within the sub-region its priority will be assisting the Northern West Sussex authorities in the first instance.

As you are aware, Mid Sussex District Council and Worthing Borough Council form part of the Coastal West Sussex and Greater Brighton group of authorities. MSDC welcome the positive work in relation to the progression of Local Strategic Statement 3 (LSS3) which will identify and manage spatial planning issues that impact across the authorities within the group, particularly assessing potential solutions to contribute towards the significant unmet need within the Coastal West Sussex and Greater Brighton area in the medium-long term. This work enables all authorities within the sub-region to understand the issues and to assess potential solutions and it is through this forum that the issue of unmet housing need should be considered more fully.

Next Steps

Mid Sussex welcomes the opportunity for further discussion with Worthing on these matters. My officers will continue to work with you in a positive manner over the review of the District Plan.

Yours sincerely,



Cllr. Andrew MacNaughton
Cabinet Member for Housing and Planning



Elmbridge
Borough Council
... bridging the communities ...

Civic Centre
High Street, Esher
Surrey KT10 9SD
01372 474474
contactus@elmbridge.gov.uk
elmbridge.gov.uk

FAO: Chief Planning Officer /
Head of Service with the responsibility for
Planning

Sent via email

contact: Suzanne Parkes
Planning Policy & Strategy
Manager

direct line: [REDACTED]
e-mail: [REDACTED]
my ref: DtC October 2021
your ref:

18th October 2021

Dear Sir/Madam,

Elmbridge Borough Council Local Plan: Meeting housing need

Elmbridge Borough Council is currently preparing a new Local Plan that will set out its development strategy and detailed planning policies for the borough up to 2037. As with most Local Planning Authorities (LPAs) in the South East, one of our biggest challenges is meeting our housing need (as set by the Government's standard methodology) against a backdrop of environmental and planning constraints.

We appreciate that LPAs are at different plan-making stages and others will be in a similar position in terms of responding positively to the challenge of addressing housing need. It is also noted that when we engaged with you in January 2020 on the potential unmet need of Elmbridge Borough and whether this can be met elsewhere, it was stated that your authority was not in a position to meet any unmet need arising from our Borough.

We are of course proactively engaging with LPAs within our housing market area to establish whether they may be able to accommodate all or part of our unmet need. However, in the event that the position of your Local Plan has changed over the last eighteen months and you consider that your authority would realistically be in a position to assist in meeting any of Elmbridge's unmet housing need, we would be pleased to discuss this with you further.

If you would like to discuss the above please do not hesitate to contact Suzanne Parkes, Planning Policy and Strategy Manager on [REDACTED] by 1st November 2021.

Yours faithfully,

[REDACTED]
Kim Tagliarini
Head of Planning Services

Contact:

Alice Henstock

E-Mail:

Your Ref:

Our Ref:

Date: 15 November 2021

Suzanne Parkes
Planning Policy and Strategy Manager
Elmbridge Borough Council

By email

Dear Suzanne,

Elmbridge Borough Council Local Plan: Meeting housing need

Thank you for your letter of 18 October 2021. Please see below Mid Sussex District Council's response to your enquiry on the ability of Mid Sussex to assist Elmbridge Borough Council in meeting its unmet housing need.

Mid Sussex Context

In our letter to you last April (14 April 2020) we set out the current position of Mid Sussex in terms of the adopted housing requirement (Mid Sussex District Plan, 2014-3031) and North West Sussex Housing Market Area (North West Sussex HMA). This remains the position at this point in time.

The Site Allocations Development Plan Document (DPD), required by District Plan Policy DP4: Housing, identifies additional housing and employment site to ensure the need is met in full over the Plan period. The DPD was submitted to PINS in December 2020 and the Hearings held in June this year; we are currently awaiting the Inspector's findings.

Elmbridge Unmet Housing Need

The Council has now started on its District Plan Review. In February this year we held a call-for-sites in order to update the Strategic Housing and Economic Land Availability Assessment (SHELAA). Several key evidence documents, including a Strategic Housing Market Assessment, Economic Growth Assessment and transport modelling, have been commissioned.

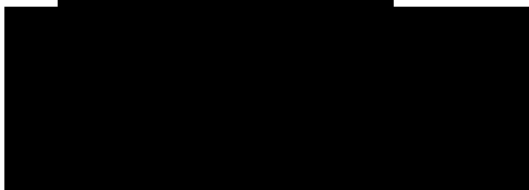
Once the above pieces of work have been completed the Council will be in a better position to understand if and how the District Plan Review will be able to sustainably meet its revised housing need, as well as any additional housing beyond its own need. However, as we explained in our previous letter, if Mid Sussex are able to assist neighbouring local authorities with their unmet housing need then it would look to those within the North West Sussex HMA as the first priority, followed by the Greater Brighton area. It therefore remains very unlikely that Mid Sussex would be able to assist in meeting the unmet need arising from Elmbridge.

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I am sorry that we are not able to be more helpful at this stage, but hope the above information clearly sets out our current position.

Yours sincerely



Alice Henstock
Principal Planner
Planning Policy

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INVESTOR IN PEOPLE

Head of Economic Promotion and Planning



Please quote:
Your reference:
Date: 3 November 2021
Please ask for: Kerry Culbert
Telephone direct: [REDACTED]
E-mail: [REDACTED]
Web: [REDACTED]



Regeneration and Culture
Muriel Matters House, Breeds Place
Hastings, East Sussex TN34 3UY

FAO: Chief Planning Officer / Head of Service with the responsibility for Planning Policy

Dear Sir/Madam,

Re: Hastings Borough Council Local Plan: Duty to Co-operate

Hastings Borough Council is currently preparing a new Local Plan that will set out its development strategy and detailed planning policies for the borough up to 2039. As with most Local Planning Authorities (LPAs) in the South East, one of our biggest challenges is meeting our housing need (as set by the Government's standard methodology) against a backdrop of environmental and planning constraints.

As part of the Plan's preparation, the Council is exploring how its housing need figure can be met. As set out in the [Regulation 18](#) Draft New Local Plan 2019-2039, it is highly unlikely that there will be sufficient land within the existing built-up areas to accommodate circ. 9,075 new homes in full. Our estimate at present is that there is sufficient land to build approximately 3,900 new homes; equating to a potential shortfall of land to accommodate 5,175 new homes.

We appreciate that LPAs are at different plan-making stages and others will be in a similar position in terms of responding positively to the challenge of addressing housing need. However, under the 2011 Localism Act and the provisions of the National Planning Policy Framework (NPPF) I am formally asking whether your authority would be able to meet any of Hastings unmet housing need?

I look forward to hearing from you on this important issue and would be grateful for a response by 1 December 2021. Please respond to [REDACTED] using the subject line "Unmet Need".

If you have any questions, please do not hesitate to contact Kerry Culbert, Planning Policy Manager [REDACTED]

Yours Faithfully,

Victoria Conheady, Assistant Director Regeneration and Culture

Contact:

Alice Henstock
E-Mail: a[REDACTED]

Your Ref:

Our Ref:

Date: 24 November
2021

Kerry Culbert
Planning Policy Manager
Hastings Borough Council

By email

Dear Kerry,

Hastings Borough Council Local Plan: Duty to Cooperate

Thank you for your letter of 3rd November 2021. Please see below the Council's response to your enquiry on the ability of Mid Sussex to assist Hastings in meeting its unmet housing need.

Mid Sussex Context

By way of context, it is perhaps helpful to set out the current position of Mid Sussex in terms of Plan making, housing requirement and its Housing Market Area (HMA).

Mid Sussex sits in the North West Sussex Housing Market area, along with Crawley Borough Council (to the north) and Horsham District Council (to the west). Within the HMA, Crawley is unable to meet its housing need in full and the unmet need arising is currently met by Mid Sussex and Horsham Districts. The southern part of the District is adjacent to the Coastal West Sussex Housing Market area, which includes Brighton and other coastal authorities. This HMA also has a high level of unmet need.

The Mid Sussex District Plan (2014 - 2031) was adopted in 2018. The District Plan has a housing requirement of 16,390. This is made up of the Mid Sussex Objectively Assessed Housing Need of 14,892 dwellings and 1,498 dwellings to ensure unmet is addressed in the Housing Market Area primarily Crawley's unmet need.

District Plan Policy DP4: Housing commits the Council to preparing a Site Allocations Development Plan Document (DPD) to identify additional housing and employment site to ensure the need is met in full over the Plan period. Work on the Site Allocations is progressing well, and it is anticipated that the document will be submitted for Examination in Summer 2020. The Council is also committed to commencing a review of the District Plan starting in 2021.

District Plan Policy DP5: Planning to Meet Future Housing Need, commits the Council to continuing to work with "all other neighbouring local authorities on an ongoing basis to address the objectively assessed need for housing across the Housing Market Areas, prioritising the Northern West Sussex HMA as it is established as the primary HMA". This policy also commits the Council to working with the Greater Brighton strategic Planning Board

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to address unmet housing need in the sub region.

The Site Allocations Development Plan Document (DPD), required by District Plan Policy DP4: Housing, identifies additional housing and employment site to ensure the need is met in full over the Plan period. The DPD was submitted to PINS in December 2020 and the Hearings held in June this year; we are currently awaiting the Inspector's findings.

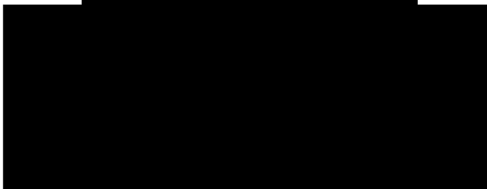
Hastings Unmet Housing Need

The Council has now started on its District Plan Review. In February this year we held a call-for-sites in order to update the Strategic Housing and Economic Land Availability Assessment (SHELAA). Several key evidence documents, including a Strategic Housing Market Assessment, Economic Growth Assessment and transport modelling, have been commissioned.

Once the above pieces of work have been completed the Council will be in a better position to understand if and how the District Plan Review will be able to sustainably meet its revised housing need, as well as any additional housing beyond its own need. However, as set out, if Mid Sussex are able to assist neighbouring local authorities with their unmet housing need then it would look to those within the North West Sussex HMA as the first priority, followed by the Greater Brighton area. It therefore remains very unlikely that Mid Sussex would be able to assist in meeting the unmet need arising from Hastings.

I am sorry that we are not able to be more helpful at this stage, but hope the above information clearly sets out our current position.

Yours sincerely



Alice Henstock
Principal Planner
Planning Policy

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Head of Economic Promotion and Planning



Alice Henstock
Principal Planner
Mid Sussex District Council

10 December 2021

Dear Alice

Chichester District Council is currently preparing a new Local Plan that will set out its development strategy and detailed planning policies for the Chichester plan area to 2039.

You may be aware that following the publication of the *Preferred Approach* Plan in 2018 the Council has been progressing its Local Plan, with a view to meeting the local housing need for the plan area in full. The Council also undertook in a Statement of Common Ground with the SDNPA to assess its ability to meet some or all of the unmet housing needs arising from the part of the South Downs National Park within Chichester District via the Local Plan Review.

The Council has attempted to progress its plan against a backdrop of underinvestment in the A27, and there has been a significant increase in the scale and costs of the mitigation package required to support in highways terms the full level of housing need and unmet need outlined in the paragraph above. Following a series of discussions with potential public sector funding providers, and National Highways, this has led to the full package being considered undeliverable at present. On 29 July 2021 Members received a *Local Plan and Strategic Update* briefing¹ and resolved –

That in the absence of significant external strategic infrastructure funding, the full scheme of improvements for the A27 Chichester Bypass...is undeliverable. Therefore, the full package will not be progressed further as part of the Local Plan process barring a significant change in the availability and likelihood of securing public sector funding support.

- and -

That ... the Local Plan Review is likely to be unable to meet full housing needs and the Plan strategy should therefore focus on delivering as much development as possible based upon the capacity of the plan area to accommodate development within an affordable and deliverable package of transport mitigation taking into account all sources of available funding.

¹ Available on the Councils website at

<https://chichester.moderngov.co.uk/ielListDocuments.aspx?Cid=308&Mid=1547>

Chichester District Council, East Pallant House, East Pallant, Chichester, West Sussex, PO19 1TY

Email: dcplanning@chichester.gov.uk

In accordance with this, officers have been negotiating with representatives from National Highways and West Sussex Highways, seeking to agree a basis for delivering growth in the Chichester plan area until any decision is reached regarding a national road scheme for the A27 bypass.

That process is ongoing. The current position is that the Council has proposed a phased approach to development and improvements to the A27 which would support delivery in the southern part of the Chichester plan area of approximately 9,600 dwellings over the Plan period to 2039, but not a higher figure. This is would present a housing shortfall of approximately 1,900 homes compared to the Local Housing Need for the Chichester Plan area of approximately 11,500 dwellings. I should stress the discussions with National Highways are ongoing and therefore this figure is subject to change, including potentially increasing.

You may be aware that the Chichester Plan area also includes all or part of a number of parishes to the north of the SDNP which is not so constrained by the A27. Therefore, in line with advice from the Planning Inspectorate the Council is investigating again the potential for development in this part of the plan area to reduce the shortfall. It is probably worth noting that the issue of water neutrality has arisen which covers this part of the Plan area which has the potential to significantly curtail development until a solution is found².

Therefore the current position is that the Local Plan Review, based on the current standard methodology and the status of discussions to date with National Highways, is unlikely to be able to meet the Local Housing Needs of the area.

As confirmed by the Planning Inspectorate, ultimately if the Council is unable to meet its housing needs then our examining Inspector "*will want to see evidence of constructive, active and on-going engagement to determine whether or not development needs could be met elsewhere*". We will raise this with the West Sussex and Greater Brighton Strategic Planning Board, but in the interests of flagging this issue at the earliest opportunity I am writing to all neighbouring authorities, and all those whose area falls wholly or partly within relevant housing market areas³, to ask for your initial views on what the potential for your authority might be to meet unmet housing needs in the Chichester Plan area, or if not, what the issues are and whether Chichester may be able to help resolve them in some way. I am also writing to highlight the capacity and investment required in the A27 as a separate, but related duty to cooperate issue, particularly as National Highways are intending to consult on options for a national road scheme on the A27 next year.

We will keep you appraised of progress in our negotiations with National Highways and water neutrality. However, I should be grateful if I could have an initial reply to this letter by 7 January, after which we will consider the initial responses and arrange meetings with relevant authorities as appropriate.

² More detail is available at <https://www.chichester.gov.uk/waterresources>

³ As set out in the document *Defining the HMA and FEMA*, Greater Brighton and Coastal West Sussex Strategic Planning Board, 2017. Available at <https://www.adur-worthing.gov.uk/media/Media,150489,smxx.pdf>

Yours sincerely



Toby Ayling
Planning Policy Divisional Manager

Contact:
Alice Henstock

Your Ref:

Date: 19 January 2022

Toby Ayling
Planning Policy Divisional Manager
Chichester District Council

By email

Dear Toby,

Chichester District Council: Unmet need

Thank you for your letter of 10th December 2021. Please see below the Council's response to your enquiry on the ability of Mid Sussex to assist Chichester in meeting its unmet housing need.

Mid Sussex Context

By way of context, it is perhaps helpful to set out the current position of Mid Sussex in terms of Plan making, housing requirement and its Housing Market Area (HMA).

Mid Sussex sits in the North West Sussex Housing Market area, along with Crawley Borough Council (to the north) and Horsham District Council (to the west). Within the HMA, Crawley is unable to meet its housing need in full and the unmet need arising from its current adopted plan is currently met by Mid Sussex and Horsham Districts. The southern part of the District is adjacent to the Coastal West Sussex Housing Market area, which includes Brighton and other coastal authorities. This HMA also has a high level of unmet need.

The Mid Sussex District Plan (2014 - 2031) was adopted in 2018. The District Plan has a housing requirement of 16,390. This is made up of the Mid Sussex Objectively Assessed Housing Need of 14,892 dwellings and 1,498 dwellings to ensure unmet is addressed in the Housing Market Area primarily Crawley's unmet need.

District Plan Policy DP4: Housing commits the Council to preparing a Site Allocations Development Plan Document (DPD) to identify additional housing and employment site to ensure the need is met in full over the Plan period. Work on the Site Allocations DPD is progressing well - the Examination hearings were held in Summer 2021, and consultation on the the Main Modifications ends on the 24th January 2022. It is anticipated that the Plan will be adopted in Spring 2022.

District Plan Policy DP5: Planning to Meet Future Housing Need, commits the Council to continuing to work with "all other neighbouring local authorities on an ongoing basis to address the objectively assessed need for housing across the Housing Market Areas, prioritising the Northern West Sussex HMA as it is established as the primary HMA". This policy also commits the Council to working with the Greater Brighton Strategic Planning Board

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to address unmet housing need in the sub region.

Chichester Unmet Housing Need

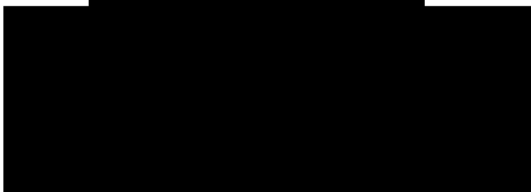
The Council has now started on its District Plan Review. This work has involved commission several key evidence documents including an update to the Strategic Housing and Economic Land Availability Assessment (SHELAA), Strategic Housing Market Assessment (SHMA), Economic Growth Assessment, transport modelling, Habitat Regulation Assessment and Air Quality Assessment. The adopted District Plan has been reviewed and policies that require review have been identified.

As stated above Mid Sussex lies within the North West Sussex HMA, along with Crawley and Horsham. If Mid Sussex can meet its housing need and there remains potential to assist neighbouring local authorities with their unmet housing need then it would look to assist those within the North West Sussex HMA as the first priority. After this, if potential remains, consideration would be given to the degree by which Mid Sussex can assist the Greater Brighton area.

The first priority within the Greater Brighton area would then be Brighton and Hove due to the small Housing Market Area overlap between parts of the south of Mid Sussex and Brighton and Hove. Therefore, it is very unlikely that Mid Sussex would be able to assist in meeting the unmet need arising from Chichester. As set out in the Memorandum of Understanding (2014) between MSDC and Chichester, given the relative distance between the local authority areas it would not be a sustainable approach to attempt to meet general housing needs within each other's districts. There has been no change in circumstance to suggest that this position has changed.

I am sorry that we are not able to be more helpful at this stage, but hope the above information clearly sets out our current position. We are happy to meet to discuss further if that would be helpful.

Yours sincerely



Alice Henstock
Principal Planner
Planning Policy

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INVESTOR IN PEOPLE

Head of Economic Promotion and Planning



Victoria Potts
Head of Planning



Town Hall
The Parade
Epsom
Surrey
KT18 5BY

Main Number (01372) 732000
Text 07950 080202
www.epsom-ewell.gov.uk
DX 30713 Epsom

Date 18 November 2022

Contact [REDACTED]
Direct line [REDACTED]

Email localplan@epsom-ewell.gov.uk

Dear Neighbours.

Duty to Cooperate: Housing Land Supply

Epsom and Ewell Borough Council is finalising its Land Availability Assessment (LAA) that will inform its new Local Plan. We contacted some of you earlier this year with our draft methodology and invited you to make comments. Thank you for the comments received.

We have now carried out the assessment and the figures are indicating that we will be unable to meet the identified housing need as calculated by the standard method. The Borough's identified need is calculated to be 576 per annum, this projected for our new plan period 2022 to 2040 is 10,368 dwellings. Taking into account the outstanding housing permissions and the potential supply in the urban area identified in the LAA, the Borough is only capable of accommodating 3849 dwellings or 37% of the calculated need.

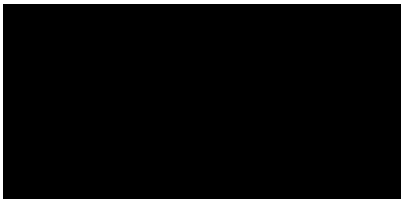
It is important that we point out that we undertook the assessments with optimal densities in mind whilst also taking into account the character of the area. Further to this we undertook some high level calculations to test higher densities. Whilst higher densities will result in more of the need being met, this only goes so far in addressing the significant shortfall (at most a few percentage points) and by doing so has implications to the character of the identified urban areas.

In light these figures and in accordance with national policy and the duty to cooperate; we are writing to our neighbours to understand whether you are able to meet some or all of EEBC's residual identified need within your area/borough? This is in the region of 6,500 dwellings up to 2040.

We would also like to take the opportunity to bring to attention to our recently published [Gypsy and Traveller Accommodation Assessment 2022](#). This identifies a need for 10 Gypsy and Traveller pitches by 2040. We are currently exploring opportunities to meet the identified needs within the borough but may have a shortfall here also and therefore would like to understand whether you are able to meet some or all of EEBC's identified need within your area/borough?

If you wish to discuss the content of the letter please let me know and we can arrange a meeting or phone call. We would be grateful for a response by 9 December 2022 so that we can consider our Spatial Strategy options in light of the responses we receive.

Yours Sincerely



Contact:

██████ e ██████████ ██████████
E-Mail: a ██████████

Your Ref:
Our Ref:

Date: 8 December 2022

Victoria Potts
Head of Planning
Epsom & Ewell Borough Council

By email

Dear Victoria,

Duty to Cooperate: Housing Land Supply

Thank you for your letter of 18 November 2022. Please see below Mid Sussex District Council's response to your enquiry on the ability of Mid Sussex to assist Epsom & Ewell Borough Council in meeting its unmet housing need.

Mid Sussex Context

By way of context, it is perhaps helpful to set out the current position of Mid Sussex in terms of Plan making, housing requirement and its Housing Market Area (HMA).

Mid Sussex sits in the Northern West Sussex HMA, along with Crawley Borough Council (to the north) and Horsham District Council (to the west). Within the HMA, Crawley is unable to meet its housing need in full and the unmet need arising is currently met by Mid Sussex and Horsham Districts. The southern part of the district is adjacent to the Coastal West Sussex HMA, which includes Brighton and other coastal authorities. This HMA also has a high level of unmet need.

The Mid Sussex District Plan (2014 - 2031) was adopted in 2018. The District Plan has a housing requirement of 16,390. This is made up of the Mid Sussex Objectively Assessed Housing Need of 14,892 dwellings and 1,498 dwellings to ensure unmet need is addressed in the Northern West Sussex HMA; primarily Crawley's unmet need.

District Plan Policy DP4: Housing commits the Council to preparing a Site Allocations Development Plan Document (DPD) to identify additional housing and employment site to ensure the need is met in full over the Plan period. The Site Allocations DPD was adopted in June of this year.

District Plan Policy DP5: Planning to Meet Future Housing Need, commits the Council to continuing to work with "all other neighbouring local authorities on an ongoing basis to address the objectively assessed need for housing across the Housing Market Areas, prioritising the Northern West Sussex HMA as this is established as the primary HMA". This policy also commits the Council to working with the Greater Brighton strategic Planning Board to address unmet housing need in the sub region.

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Epsom & Ewell Unmet Housing Need

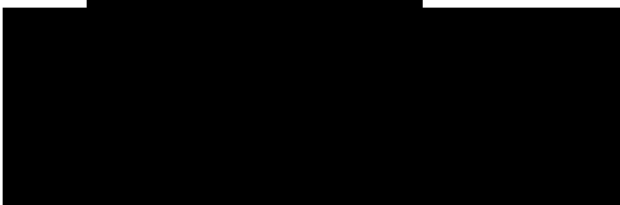
The Council started its District Plan Review early last year. Over the last 18 months or so a number of key evidence documents have been progressed to enable us to reach Regulation 18 stage. Our District Plan Consultation Draft (2021 – 2039) is currently out for public consultation until 19 December 2022. The draft Plan and supporting evidence is available to view on the [District Plan Review webpage](#).

At this point in time, the draft Plan identifies sufficient housing sites to meet our revised identified housing need of 20,142 dwellings to 2039 (Policy DPH1: Housing), with a small over supply. If, as the draft Plan progresses, Mid Sussex are able to assist neighbouring local authorities with their unmet housing need then it would look to those within the Northern West Sussex HMA as the first priority, followed by the Greater Brighton area. It therefore remains very unlikely that Mid Sussex would have sufficient capacity remaining to be able to assist with meeting the unmet need arising from Epsom & Ewell.

With regards to Gypsy and Traveller accommodation, an updated Gypsy and Traveller Accommodation Assessment (GTAA) has been undertaken for Mid Sussex district, including the areas of the district that fall within the South Downs National Park (SDNP). Policy DPH29: Gypsies, Travellers and Travelling Showpeople within our draft Plan identifies a need of 16 pitches within the district, outside of the SDNP. Taking into account commitments, there is a residual need of four pitches which are proposed to be met on one of our significant site allocations. The SDNP's current unmet need is four pitches. Given the geographical context of the GTAA, if we were able to sustainably meet any unmet pitch need we would likely prioritise that of the SDNP and/ or immediate neighbouring authorities.

I hope the above information clearly sets out our current position.

Yours sincerely



Alice Henstock
Principal Planner
Planning Policy

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INVESTOR IN PEOPLE

Head of Economic Promotion and Planning



Email: planningpolicy@chichester.gov.uk

F.A.O. Planning Policy Manager
Sent by email only

12th December 2022

Dear Sir or Madam

Chichester Local Plan 2021 – 2039

Chichester District Council is currently preparing a new Local Plan that will set out its development strategy and detailed planning policies for the Chichester plan area to 2039. As with most Local Planning Authorities (LPAs) in the south east, one of our biggest challenges is meeting our housing need against a backdrop of environmental and infrastructure constraints.

You may recall that we wrote to you in December 2021, outlining the work the Council was undertaking to agree a strategy with National Highways and West Sussex County Council for delivering growth in the Chichester plan area until a decision is reached regarding a national road scheme for the A27 bypass, as well as investigating the potential for development in the northern part of the Chichester plan area.

The current position is that the Council is proposing a development strategy that would support delivery of 10,350 homes over the plan period to 2039 (9,630 dwellings in the southern plan area and 720 dwellings in the northern plan area). This would present a housing shortfall of 1,134 dwellings compared to the Local Housing Need figure for the Chichester Plan Area of 11,484 dwellings.

We appreciate that LPAs are at different plan-making stages and others will be in a similar position in terms of responding to the challenge of addressing housing need. It is noted that when we engaged with you in December 2021 on our potential unmet need and whether this could be met elsewhere, it was stated that your authority was not in a position to meet any unmet need arising from the Chichester Plan Area. However, in the event that the position of your Local Plan has changed over the last 12 months and you consider your authority would be in a position to assist in meeting any of Chichester's unmet housing need, we would be pleased to discuss this with you further.

We also wanted to raise the issue of Gypsy and Traveller and Travelling Showpeople's needs. In relation to Gypsy and Traveller's needs the Council are currently in a position where we are unlikely to be able to meet the needs of all

2.

Chichester Local Plan 2021 – 2039

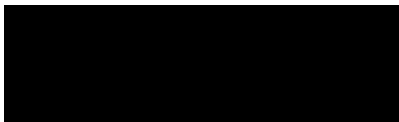
12 December 2022

Gypsy and Travellers (including those who don't meeting the Planning Policy for Traveller Sites definition, taking into account the recent Lisa Smith judgement) and we are, therefore, asking if you have capacity in order to meet our unmet needs in the first 5 years, which will be at least 10 pitches (however, this is based on the most optimistic approach to potential supply). However, for the rest of the plan period, we are anticipating that on the basis of windfall rates and through utilising the Site Allocation Development Plan Document, we are hopeful that we can, in theory, meet longer term needs (but this will be subject to testing at Examination).

In terms of Travelling Showpeople plots both for the first 5 years and the rest of the plan period we will be falling short of meeting our identified need. The current situation is that of a total need of 40 over the plan period, the unmet need is likely to be 21 plots. The supply proposed to for meeting the need is only likely to be deliverable after the first 5 years, therefore, the majority of the unmet need falls within the first 5 years.

We would be grateful if you could respond to this letter by 13 January 2023.

Yours sincerely



Tony Whitty
Planning Policy Divisional Manager

Contact:

Alice Henstock

E-Mail:

Your Ref:

Our Ref:

Date: 9th January 2023

Tony Whitty
Planning Policy Divisional Manager
Chichester District Council

By email

Dear Tony,

Chichester District Council: Unmet need

Thank you for your letter of 12th December 2022. Please see below the Council's response to your enquiry on the ability of Mid Sussex to assist Chichester in meeting its unmet housing need.

Mid Sussex Update

Since we engaged with you in December 2021, work on the District Plan Review has progressed. The draft Regulation 18 District Plan 2021 – 2039 was published for consultation in November 2022. An updated Local Development Scheme has also been published which proposes a Regulation 19 consultation in Autumn 2023 and Submission in Winter 2023.

The draft District Plan sets out the Strategy for growth until 2039. The strategy is based on for key principles:

- Protection of designated landscapes (AONB)
- Making effective use of land
- Growth at existing sustainable settlements where it continues to be sustainable to do so
- Opportunities for extensions, to improve sustainability of existing settlements that are currently less sustainable

The draft District Plan sets a total housing need of 20,142 dwellings over the Plan period (an average of 1,119 dwellings per annum). This figure has been calculated using the standard method. The housing need will be met in full as set out below:

Housing Need	20,142
Housing already planning for	11,973
Residual housing need	8,169
District Plan Review Allocations	6,757
Windfall Allowance	1,714
Total Plan Supply	8,471
Total under/over supply	+302

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Head of Planning Policy and Housing Enabling



The 302 dwellings oversupply will provide some flexibility and resilience to housing supply for Mid Sussex.

The Housing Allocations included in the Plan are the result of a clear and transparent, evidenced based site selection process. Further information about this process can be found on the web site at [District Plan 2021-2039 Evidence Base - Mid Sussex District Council](#)

As set out in our letter of December 2021, Mid Sussex predominantly sits in the Northern West Sussex Housing Market Area, along with Crawley Borough Council and Horsham District Council. Within the HMA, Crawley is unable to meet its housing need in full and the unmet need arising from its current adopted plan is currently met by Mid Sussex and Horsham Districts. Progress on the Horsham and Crawley Regulation 19 Plans has been delayed due to water neutrality and therefore the extent of the unmet need in the NWS HMA is currently unknown.

Mid Sussex updated in Gypsy and Traveller Accommodation Assessment (GTAA) in 2022. The GTAA identifies a need for 4 permanent pitches for Gypsies and Travellers who still travel and 12 net permanent pitches for Gypsies and Travellers who no longer travel. This need will be met through existing commitments and on-site provision on Significant Site allocations. Mid Sussex is unable to assist in meeting Chichester's unmet need for Gypsies and Travellers or Travelling Showpeople. This is due to the shortage of available sites.

Chichester Unmet Housing Need

As stated above Mid Sussex lies within the Northern West Sussex HMA, along with Crawley and Horsham. The District Council's first priority is to meet its housing need in full; if there is any over-supply the next priority is to assist with the unmet need arising in the Northern West Sussex HMA. Subject to this being met, the next priority is to assist the Coastal HMA.

There are some overlaps between the Coastal HMA (Brighton) and the southern part of Mid Sussex. Should Mid Sussex be able to assist with unmet need arising within the Coastal HMA, its first priority would be to assist Brighton and Hove due to the identified links between the two authorities.

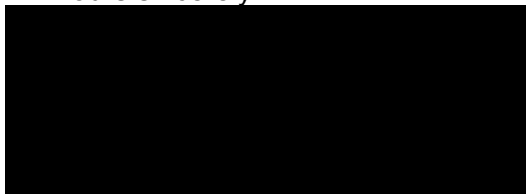
Given the priorities set out above, it is very unlikely that Mid Sussex would be able to assist in meeting the unmet need arising from Chichester. As set out in the Memorandum of Understanding (2014) between MSDC and Chichester, given the relative distance between the local authority areas it would not be a sustainable approach to attempt to meet general housing needs within each other's districts. There has been no change in circumstance to suggest that this position has changed and the other areas have higher priority should Mid Sussex be able to make any contribution to needs arising outside its authority area.

Notwithstanding the above, the most appropriate mechanism for addressing the unmet need of Chichester, as part of the Coastal West Sussex HMA, is through the progression of Local Strategic Statement 3 (LSS3). MSDC welcome the positive work in relation to the progression of Local Strategic Statement 3 which will identify and manage spatial planning issues that impact across the authorities within the group, particularly assessing potential solutions to contribute towards the significant unmet need within the Coastal West Sussex and Greater Brighton area in the medium-long term. This work would enable all authorities within the sub-region to understand the issues and to assess potential solutions and it is through this forum that the issue of unmet housing need should be considered more fully and holistically. MSDC would welcome confirmation that Chichester is doing what it can to progress LSS3 in a timely manner.

I am sorry that we are not able to be more helpful at this stage, but hope the above information

clearly sets out our current position. We are happy to meet to discuss further if that would be helpful.

Yours sincerely



Alice Henstock
Principal Planner
Planning Policy

Economy and Planning

Contact name: [REDACTED]

Email: [REDACTED]

Date: 14 April 2023

Direct line: [REDACTED]



By Email Only

Dear Head of Planning,

Crawley Borough Submission draft Local Plan 2024 – 2040: Duty to Cooperate

As you may be aware, the Crawley Borough Local Plan 2024 – 2040 was approved for publication and submission at the Full Council meeting held on 22 February 2023. The publication consultation will take place for a 6-week period commencing **Tuesday 9 May until Tuesday 20 June 2023**.

The purpose of this letter is to draw your attention to the Crawley Local Plan in relation to meeting Crawley borough's objectively assessed development needs. The Local Plan has been prepared in the context of substantial, positive, ongoing cross-boundary working carried out over the various functional strategic areas of which Crawley forms part and I acknowledge and thank you for this.

As you are aware this will be the third time the draft Crawley Local Plan review has been subject to formal Publication (Regulation 19) consultation. Ahead of the initial Publication consultation held in January 2020, Crawley Borough Council sent a formal letter requesting assistance in addressing identified unmet development needs as part of the Local Plan Review. A number of Statements of Common Ground have since been agreed between authorities (attached where relevant) and our Duty to Cooperate Statement has been updated to document these and all the work which has been carried out to date in relation to cross-boundary, strategic issues.

I invite your comments on the information provided within the updated draft Duty to Cooperate Statement (enclosed).

In particular, I formally request confirmation of the role your authority is able to play in assisting my council in addressing identified unmet development needs under the Duty to Cooperate provisions:

- The updated total **unmet housing need**, calculated for the Local Plan Review, based on the Standard Methodology for housing, arising from within Crawley over the Plan period (2024 – 2040) is **7,050 dwellings**.
- In addition, there are particular housing types which are needed to meet the needs of specific communities.

Overall Housing Need:

Crawley's submission Local Plan confirms that the government's Standard Methodology for calculating housing need results in a total housing need for the 16 year Plan period (2024-2040) of 12,080 dwellings (based on 755 dwellings per annum (dpa)).

The draft Local Plan identifies that the borough's land supply allows 42% of this to be met on sites within the borough's administrative boundaries: a minimum totalling 5,030 dwellings. This equates to an annualised average of 314dpa.



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However, a stepped trajectory is reflected in the Policy to account for the higher delivery in the early Plan period and the lower anticipated levels towards the end (due to the build out of the last remaining large sites available within the borough):

- Years 1-5 (2024-29): 400 dwellings per annum (dpa)
- Years 6-10 (2029-34): 360dpa
- Years 11-16 (2034-40): 205dpa.

The council is working hard to maximise capacity within the borough's boundaries, including by introducing extremely high density targets for the Town Centre and accessible locations and a series of housing typology policies to positively influence development opportunities within the borough.

This leaves a total unmet need figure of 7,050 dwellings to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.

In addition to the overall unmet housing needs amount, the 2019 Strategic Housing Market Assessment (SHMA) considered the needs of specific communities within the borough. More details are set out in our draft Unmet Needs Topic Paper, enclosed for information and any detailed factual comments.

Affordable Housing:

With particular reference to affordable housing, the SHMA has highlighted a net need for 739 affordable homes per year in Crawley (of which 563 dwellings per year are needed as rented affordable housing). As Crawley is only able to meet approximately 42% of its overall housing needs within the borough, even with 40% affordable housing requirement proposed by the draft Local Plan policy, there will be a significant shortfall of affordable housing. In addition, viability evidence has confirmed it is not possible to require 40% affordable housing from town centre residential developments, in these cases the Policy establishes a 25% affordable housing requirement. On this basis, less than 15% of Crawley's affordable housing needs can be met within the borough (108dpa).

Therefore, where Crawley's unmet housing needs are being met outside the borough boundary, it is requested discussions can take place to explore and agree mechanisms for opportunities for Crawley's affordable housing needs to similarly be met, including through nomination rights being extended to residents on Crawley's housing register. This is particularly, but not restricted to, where housing is coming forward in developments on Crawley's boundaries.

Self and Custom Build Homes:

The SHMA has also highlighted the need for Duty to Cooperate discussions to explore opportunities to meet needs of those who wish to Self- or Custom-Build their own home. As a planned, urban New Town, the potential for meeting the level of development needed is limited within Crawley borough. Also, the high density nature of the majority of Crawley's anticipated delivery, particularly in the Town Centre, is not often appropriate for Self- or Custom-Builders.

The emerging Crawley Borough Local Plan proposes a draft policy approach. However, discussions would be welcomed to consider whether there are opportunities for this to be considered over a wider area (particularly if there are duplicate entries across districts and boroughs).

I appreciate we are currently in the pre-Election period, but I would welcome an initial officer response from your local authority by **Friday 28 April 2023**, to help confirm the understanding between us with regard to whether your authority is able to assist Crawley in meeting its unmet needs. Further discussions can then take place between our authorities, as necessary, ahead of the submission of the Crawley Borough Local Plan for its Examination.

Any concerns you may have with the updated DtC document, particularly where your authority is referred to, would also be welcomed by **28 April** so that any issues can be addressed before we publish the document for consultation on 9 May. More general responses can obviously be made during our Publication consultation.

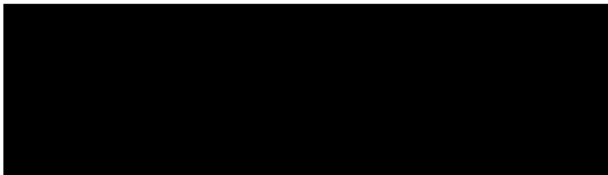
It would also be helpful to understand, where we have an agreed Statement of Common Ground, if this needs to be updated; or, where we don't have an existing agreed Statement of Common Ground, if this is something we should consider preparing in advance of the submission of the Crawley Borough Local Plan (anticipated to be during July 2023).

Similarly, please let me know if your authority considers there are any other strategic issues not sufficiently covered or ways in which you believe Crawley may be able to assist you in your strategic planning needs.

Please contact me or the Planning Policy Manager, Elizabeth Brigden, should you have any questions or require further clarification with any of the content included above.

I look forward to continuing to work with you in the future to seek positive solutions to these challenging strategic issues.

Yours Sincerely,



Clem Smith
Head of Economy and Planning

Contact:
Planning Policy
planningpolicy@midsussex.gov.uk

Date: 20 June 2023

forwardplans@ Crawley.gov.uk
By e-mail only

Dear Sir / Madam,

Crawley Local Plan 2024 – 2040 – Submission version (June 2023)

Mid Sussex welcomes the opportunity to comment on the submission Crawley Local Plan (the Plan) and our detailed comments build on our earlier response to the Regulation 18 draft of the Local Plan and those made in March 2020 in relation to the first regulation 19 consultation and the second in June 2021. It is noted that comments made to previous consultations do not need to be repeated and all Regulation 19 representations will be submitted in full to the Secretary of State for the Examination. For ease, a copy of our responses made in March 2020 and June 2021 is attached.

In a letter dated 14 April 2023 to Mid Sussex DC, Crawley BC also sought confirmation of the role Mid Sussex can make in assisting Crawley to address unmet housing needs and specific communities housing needs. Mid Sussex District Council's response to this request is also set out in this letter.

Local Plan Comments

Mid Sussex has reviewed Crawley's Plan and accompanying evidence that has been prepared to support the Plan.

Strategic Policy SD3: North Crawley Area Action Plan (now deleted)

Mid Sussex is disappointed that this policy has been deleted and therefore that an opportunity to review the future growth and operational needs of the airport alongside other development needs of Crawley, including economic growth and housing, to enable efficient use of land within Crawley is no longer included.

Our previous comments made in March 2020 and June 2021 remain relevant.

Policy EC4: Strategic Employment Location

In previous consultation responses, Mid Sussex raised concerns about the impact of this proposed allocation on the highway network. In June 2021, it was suggested that engagement with Mid Sussex would be helpful to enable a better understanding of the potential impacts however this has not been forthcoming.

It is noted that there has been an amendment to the policy, with the addition of Criterion (d) which seeks to restrict movement of HGV from the north, which means that access will be from the south with the potential to further exacerbate issues on the local road network in Mid Sussex as set out above.

Therefore, the Council considers that the the Policy requires further justification.

Changes required: Further evidence is required to demonstrate that the policy is justified by highways evidence. The Council is not satisfied that the cross-boundary impacts of the policy in Mid Sussex are fully supported by the transport evidence. Following an assessment of the impact of this proposed allocation the policy should be amended to make explicit any mitigation measures required to alleviate highways impacts in Mid Sussex District.

Policy CL3 – Movement Patterns, Layout and Sustainable Urban Design

This policy was part of CL4 in the 2020 version, previous comments made in March 2020 and June 2021 remain relevant.

Policy CL4 – Compact Development – Layout, Scale and Appearance

This policy was part of CL5 in the 2020 version, previous comments made in March 2020 and June 2021 remain relevant.

Mid Sussex supports this policy in principle as it seeks to make more efficient use of land.

The Council notes that the policy has been amended to support the requirement for higher density outside locations identified in (i) and (ii), but considers that the Policy would be more effective if the 'appropriate levels of accessibility to enhance public transport services' are defined.

Changes required: An explanation of how 'appropriate levels of accessibility to enhance public transport services' will be defined is also required.

Policy CL8: Development Outside the Built-up Area

Response from January 2020 continues to apply.

Policy H3d: Upward Extensions

Response from January 2020 continues to apply.

Urban Extensions: 'At Crawley' (Paragraph 12.17 – 12.23)

Response from June 2021 continues to apply.

Habitat Regulation Assessment:

It is noted that a Habitat Regulation Assessment has now been prepared to support the Regulation 19 Plan which addresses this Council's concerns raised in June 2021. Mid Sussex has no further comments on the HRA.

Housing Supply and Unmet Need

There has been a long-standing and ongoing engagement between the Northern West Sussex Housing Market Area (NWS HMA) authorities (Crawley, Horsham and Mid Sussex), and therefore the position in relation to Crawley's housing need and supply is understood.

The three authorities have agreed that housing supply is a strategic cross-boundary issue and consequently have worked effectively to understand and assess options for maximising housing supply to meet local needs within the HMA.

This approach is set out in the Housing Statement of Common Ground which is being finalised by the three authorities and which will capture the agreements between the NWS HMA authorities on principles such as the HMA boundary, housing need, site selection processes and considerations for housing supply.

Mid Sussex District Council notes that the Crawley Submission Local Plan updates the unmet need position, such that the current calculation shows an unmet need of 7,050 dwellings over the plan period 2024 - 2040, and that Crawley Borough Council has formally requested assistance to meeting the unmet need.

The adopted Mid Sussex District Plan (policy DP5: Planning to Meet Future Housing Need) demonstrates that MSDC is committed to working with neighbouring Councils on an ongoing basis to address housing needs across the HMA based on the evidence. The adopted District Plan includes a contribution of 1,500 dwellings to meet the unmet need arising in the HMA which, alongside the contribution made by Horsham District Council, ensured that the HMA housing need could be met in full. The Council remains committed to working jointly and proactively on this matter and the forthcoming Housing Statement of Common Ground will demonstrate this commitment across the HMA.

As you are aware, Mid Sussex District Council published a draft District Plan (Regulation 18) for consultation in November 2022.

In respect to the ongoing engagement with Councils in the NWSHMA ahead of publishing its Regulation 18 draft, Mid Sussex District Council:

- shared the draft Site Selection Methodology and invited comments before publication;
- held briefings for NWSHMA Councils to share the initial outcomes of the Site Selection process, which included:
 - examples of sites that performed well against the Site Selection criteria and would therefore have potential allocation, and those that have been rejected due to constraints and deliverability issues
 - outcomes from the evidence base, particularly Transport and Air Quality modelling
- commissioned an Urban Capacity Study, by external consultants, with an objective to maximise brownfield development in urban areas to seek to increase supply from this source.

The Regulation 18 draft District Plan established a housing need of 20,142 for Mid Sussex. As a result of the evidenced outcomes from the Site Selection process and findings from the evidence base, the draft District Plan proposed a total supply of 20,444. Therefore, the draft District Plan demonstrated an over-supply of 302 dwellings.

The Council is reviewing the responses from all parties during Regulation 18 consultation. This includes assessment of comments received from those promoting sites omitted from the Regulation 18 plan, and new sites submitted during the consultation. This work is ongoing and the potential housing supply in the Regulation 19 Plan will be subject to completion of this work and detailed testing through the evidence base. As such, the Council is currently not in a position to confirm the total deliverable housing in the District and therefore the amount of housing it may be able to provide to meet unmet need.

This Council will continue to positively engage with Crawley Borough Council as the review of the District Plan progresses, in line with the agreed principles and mechanisms outlined in the NWS Statement of Common Ground, forthcoming Housing Statement of Common Ground and other relevant cross-authority groupings.

Yours sincerely,



Deputy Chief Executive

Via email only

Our ref: Strategic Planning
/DtC/Mid Sussex

Your ref:

Date: 24 November 2023

Dear Andrew,

Horsham District Local Plan: Addressing housing and Gypsy & Traveller Needs

We recently met at an officer level to discuss progress on our respective Local Plans. During the meeting we discussed that though our Local Plan was still in production, it looked likely that the Local Plan would be unable to fully accommodate assessed needs for housing and Gypsy & Traveller provision. We are now able to confirm our position in respect of these matters.

Housing

Historically, HDC has been in a position to fully address its own housing needs. Indeed our current Local Plan, the Horsham District Planning Framework (HDPF) not only met our objectively assessed needs, but contributed an additional 150 homes per year to accommodate unmet needs in Crawley Borough.

The process of preparing a new Local Plan for Horsham District began in 2018. By July 2021 a draft Regulation 19 document was considered by our Cabinet which recommended that it should be considered at full Council to allow for the it to be published for a representation period. This draft Regulation 19 document, among other matters, set an annualised housing target of 1,100 per year – a figure beyond HDC's standard methodology number. This figure would meet 50% of the unmet needs of Crawley Borough Council (with whom we share our primary housing market area with yourselves), as well as make a small allowance for Sussex coastal areas (with whom we share a secondary housing market area). Such a figure was towards the top end of what our evidence base stated could be delivered at that time.

Prior to our full Council having opportunity to consider the Regulation 19 Plan, the NPPF was revised. Counsel advice was received on these amendments that stated that changes were necessary to make the plan sound and in line with national policy. Subsequently, Cabinet and Council dates were set up for November 2021 to progress an updated version of the Local Plan.

On 14th September 2021, Crawley Borough Council, Chichester District Council and HDC received a Position Statement from Natural England¹. An addendum to the Position Statement was subsequently made in November 2022². Collectively, Natural England assert that water in the district is sourced from the Arun Valley, which includes sites protected by the Habitats Regulations. Natural England further explain that it cannot be concluded that the existing

¹ https://www.horsham.gov.uk/_data/assets/pdf_file/0019/106552/Natural-Englands-Position-Statement-for-Applications-within-the-Sussex-North-Water-Supply-Zone-September-2021.pdf

² https://www.horsham.gov.uk/_data/assets/pdf_file/0012/120315/Addendum-to-Position-Statement-Nov-22.pdf

abstraction is not having an impact on these protected sites and that development must not add to this impact.

The result of this Position Statement is that we are currently unable to determine planning applications positively unless water neutrality can be demonstrated. The impact of this has been severe – in the 25 months since September 2021 only 602 homes have been approved. To put this into context, in the three years prior to the Covid pandemic, our average annual housing delivery was just under 1,200 per year.

The impact of the Position Statement on our Local Plan has been similarly severe, as it has taken time to develop an evidence base to understand the effect it would have on future development in the district. Our work on water neutrality, undertaken with our partner authorities and organisations, has now been uploaded to our [evidence base webpage](#). The upshot of such work is that the capacity of Horsham District to deliver development is now limited due to the need for all development to be water neutral.

The lack of recent approvals also means that our housing supply is less than anticipated, accordingly, we expect low delivery over the next five years. Our Housing Delivery evidence (expected to be published in January 2024) also sets out that we will not be able to ensure that our standard method derived figure (911 per year) could be accommodated.

A proposed Regulation 19 Local Plan is being considered by Cabinet and Council on 11th December. Because of the issues highlighted above, the Local Plan will not be able to put forward a strategy that can ensure that we can achieve 911 homes per year. Instead, it will set out an annualised housing target for the period 2024-2040 of around 777, with a stepped trajectory that rises from around 480 in years 2023/24-2027/28 to around 901 in the years 2028/29-2039/40. This means that we will have a shortfall of around 2,275 over the plan period.

At our recent meeting we discussed the ability of your authority to accommodate our housing needs, should they not be able to be fully addressed in our Local Plan. Could you confirm your position in respect of this, in writing?

Gypsy and Traveller Provision

At our recent meeting we discussed the needs for Gypsy and Traveller (G&T) provision and explained that an updated needs assessment was underway in Horsham District. This work is near finalisation and is intended to be published in January 2024 to coincide with the expected Regulation 19 period on our Local Plan. We are now in a position to state that our proposed Regulation 19 document will set out sufficient allocations to meet G&T households meeting the PPTS definition over the first ten years of the plan.

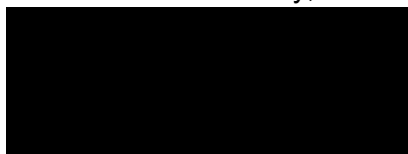
Despite this, we will be unable to fully address our need over the plan period. This is mainly as the assessment identified a large need for pitches for those G&T households that do not meet the PPTS definition of G&T for planning purposes (35 pitches) and the needs of those where it could not be concluded that they met the definition (21 pitches). Together with a shortfall of two pitches for those who meet the PPTS definition, that will mean that we have a shortfall of 58 pitches over the plan period.

At our recent meeting we discussed the ability of your authority to accommodate our gypsy and traveller needs, should they not be able to be fully addressed in our Local Plan. Could you confirm your position in respect of this, in writing?

I hope that the letter is clear. If you require clarification, please contact Tal Kleiman, Senior Planning Policy Officer on 01403 215213 or tal.kleiman@horsham.gov.uk in the first instance.

We look forward to receiving your response to the matters referred to in this letter at your earliest convenience.

Yours sincerely,



Catherine Howe
Head of Strategic Planning

Contact
Planning Policy
01444 477053

Email
Planningpolicy@midsussex.gov.uk

Date
1 March 2024

Horsham District Council
Sent by Email only.

Dear Sir/Madam,

Horsham District Council – Local Plan 2023 – 2040: Regulation 19

Mid Sussex District Council ('the Council') welcomes the opportunity to comment on the Horsham District Local Plan 2023 – 2040 ('the Plan').

The Council continues to welcome the longstanding, ongoing and effective engagement with Horsham DC on cross-boundary strategic matters. This includes engagement with the Northern West Sussex Housing Market Area (NWSHMA) and West Sussex and Greater Brighton Planning Board, which has been supported by the joint commissioning of evidence-based studies. This engagement has led to a detailed understanding of the factors that influence the content of the Regulation 19 Horsham Local Plan. As a consequence, this Council considers that the legal and procedural requirements of the Duty to Co-Operate have been met which is reflected by the agreed Statements of Common Ground between the authorities.

In July 2023 the NWSHMA authorities (Crawley, Horsham and Mid Sussex) agreed a Housing Need Statement of Common Ground (SoCG). This set out the authorities' agreed position with regards to Housing Market Area boundaries, a priority order for assisting with unmet needs where possible, the current need position and principles of site selection. The Council is pleased that these areas of agreement have been reflected within the Plan. In particular, the recognition that there is an increased challenge for all three authorities to accommodate increasing housing need over the plan period is acknowledged.

The three HMA authorities have worked collectively to meet the housing need within the NWSHMA and this is reflected in the three adopted Local Plans. However, due to increased housing need since those plans were adopted and the constraints placed upon Crawley and Horsham by the position on Water Neutrality impacting the Sussex North Water Resource Zone, the unmet need in the NWSHMA is now almost 10,000 dwellings.

The Housing Need SoCG agrees the principles of site selection, ensuring all three authorities are exploiting all opportunities to maximise housing supply to address housing needs in the HMA as far as is consistent with the NPPF. The Council has reviewed the principles and methodology for site selection set out in Horsham's "Site Assessment Report" and they accord with the agreed SoCG and are consistent with the principles used in this Council's Site Selection process which has informed the submission draft Mid Sussex District Plan.

Mid Sussex District Council is fully cognisant of the constraints to housing delivery placed upon Horsham's Local Plan by Natural England's Position Statement on Water Neutrality. This Council is

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Planning Policy and Housing Enabling
Deputy Chief Executive – Judy Holmes

Chief Executive - Kathryn Hall



fully engaged in this matter, being a member of the local authority groupings set up to seek solutions. The Council acknowledges that housing supply within Horsham district is significantly reduced by comparison to previous delivery rates in comparison to the Regulation 18 draft Plan. There is now an unmet need of 2,275 dwellings.

This Council is content that Horsham is maximising housing supply as far as is possible at this time given the constraints imposed by Water Neutrality. However, the Council is also fully aware that this is a temporary position to which a solution(s) is being sought. The Council supports and welcomes the confirmation within paragraph 10.13 of the Plan that Horsham District Council will revisit the unmet need position in future Plan reviews. In the meantime, the Council urges Horsham District Council to take every opportunity to increase housing supply should opportunities (which are consistent with achieving water neutrality) present themselves within the plan period.

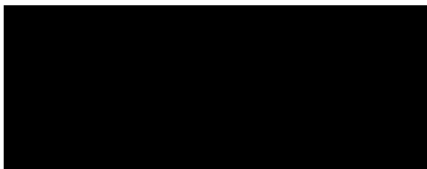
The Council notes that Horsham District Council has formally requested assistance with meeting unmet housing needs. This has been carefully considered during preparation of this Council's submission draft District Plan 2021 – 2039 which has been subject to Regulation 19 consultation during January/February 2024.

The suitability of sites for inclusion in the submission draft District Plan is led by the Council's published site selection process and performance against the agreed Site Selection Methodology and accompanying evidence base (including Sustainability Appraisal, Air Quality assessment and Transport modelling). Mid Sussex District Council consulted neighbouring authorities on its Site Selection Methodology and shared initial findings from the process to demonstrate the extent to which the Council are maximising housing supply.

The July 2023 SoCG agreed that any available housing supply above meeting local need will be prioritised in the first instance to the Northern West Sussex HMA. In respect to this Council's supply, application of the Site Selection Methodology results in a supply-led figure which meets Mid Sussex housing need with an over-supply of 996 dwellings. Any provision over and above meeting Mid Sussex housing need will be prioritised in accordance with the SoCG.

The Council recognises that Horsham District Council has an unmet need of 58 Gypsy and Traveller pitches over the plan period. This position has only recently been confirmed and therefore post-dates the publication of this Council's submission draft District Plan. Whilst Mid Sussex District Council can demonstrate that it is able to meet its Gypsy and Traveller Need in full (including the need generated within the area of South Downs National Park in Mid Sussex district) there is insufficient suitable supply to be able to assist with unmet need arising within Horsham district. The Council are happy to engage further on this matter ahead of our respective submissions.

I hope these comments are helpful. The Council is committed to continuing its engagement Horsham District Council as our plans progress towards adoption. This includes the preparation of bilateral Statements of Common Ground and appearing at the examination hearings.



Cllr Robert Eggleston
Leader of Mid Sussex District Council

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Alice Henstock
Senior Planning Officer
Mid Sussex District Council
Oaklands
Oaklands Road
Haywards Heath
West Sussex
RH16 1SS

Planning Policy

Date: 7 February 2024

Dear Alice

Lewes District Local Plan - Duty to Cooperate request to consider unmet development needs arising from Lewes District

Lewes District Council is currently progressing work on its new Local Plan. This will cover the period 2020 to 2040. As part of this process, the Council is engaging with surrounding authorities and other stakeholders on strategic cross-boundary matters.

Housing is a key issue that needs to be considered in both the local and strategic contexts. This includes meeting identified needs for housing. To inform the production new Lewes District Local Plan, Lewes District Council has undertaken an assessment of potential land that is available for development to support the growth needs of the plan area during the next plan period. The findings from the Land Availability Assessment (LAA) have indicated that Lewes District will likely not have enough appropriate land available that can be allocated to meet its growth needs for housing.

Lewes District currently has an annual requirement for 602 dwellings per annum. Over the plan period this is equivalent to 12,040 new dwellings to be delivered in the plan area. Based on our evidence to date, the plan area will be unable to accommodate this level of growth over the plan period. The Plan will likely deliver between approximately 5,412 to 9,365 dwellings, resulting in a shortfall of approximately 2,675 to 6,628 dwellings. The exact shortfall will be determined through the production of the draft Regulation 18 version of the new Local Plan later this year.

The National Planning Policy Framework (NPPF, paragraph 61) states that, in planning for housing growth through a local plan, authorities should take into account needs which cannot be met within surrounding areas. I am therefore writing to you, and to all other surrounding local authorities, to make you aware that it is likely that there will be unmet needs arising from our plan area which, in accordance with the NPPF, your authority will be required to consider as part of the review and/or production of a new local plan.

The issues outlined in this letter will be discussed through our continued collaboration as part of the production of the new Lewes District Local Plan. Officers from your authority have been invited to a Duty to Cooperate workshop taking place on the 15th February, where we would be pleased to discuss this matter further.

Lewes District Council

Southover House
Southover Road
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East Sussex
BN7 1AB

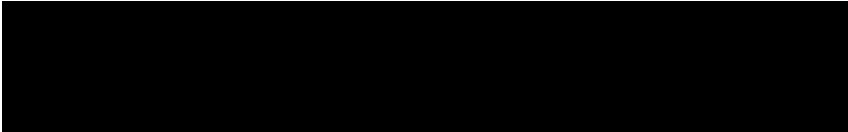
Eastbourne Borough Council

1 Grove Road
Eastbourne
East Sussex
BN21 4TW

Please do not hesitate to contact me if you have any questions or you require any further information at this time.

Yours sincerely,

Cllr Laurence O'Connor
Lewes District Council
Cabinet Member Planning, and Infrastructure



Contact: Planning Policy
NAME [REDACTED]
Planni [REDACTED]

Date:
19th February 2024

Dear Sir/Madam,

Lewes District Local Plan – Preferred Policy Directions and Options for Growth Consultation (Regulation 18)

Mid Sussex District Council ('the Council') welcomes the opportunity to comment on the Preferred Policy Direction and Options for Growth consultation of the Lewes District Local Plan ('the Plan').

Lewes published its Issues and Options for consultation in 2021, to which this Council responded. In our response, we clearly set out our concerns regarding the option for delivering growth through *Urban extensions to Burgess Hill and Haywards Heath*. Notwithstanding the lack of clarity on the capacity for growth in terms of available sites, other crucial dependencies such as infrastructure capacity and transport were not raised with this Council in advance of this consultation. This is despite your draft Plan acknowledging that "*This option could only be pursued by working in partnership with Mid-Sussex District Council...*".

In response to the latest Regulation 18 Plan, the Council notes that, the "Development Strategy" section includes six spatial options for housing growth with little clarity on your preferred strategy. Spatial Option 3 *Urban Extensions to Burgess Hill and Haywards Heath* provides "*opportunities to better grow the existing towns*". Figure 12 and Table 6 indicate that there are four potential locations for development with a combined yield of 504 dwellings. Lewes' 2023 Land Availability Assessment (LAA) shows one site of 127 dwellings near to Burgess Hill (04DT) and three sites ranging from 27 to 200 dwellings (35WV, 39WV and 40WV) near to Haywards Heath. All four sites are greenfield, in conflict with your Plan's Preferred Policy Direction to "*direct development to locations that are the most sustainable, which is often brownfield land within existing settlements.*"

The Council is extremely disappointed that Lewes District Council once again has not approached this Council to discuss these potential options, outside of the formal consultation stages. In our response to your previous Regulation 18 consultation (August 2021), we emphasised our expectations for early discussion on all cross-boundary issues to understand the potential impacts. It is of some concern that this engagement has not taken place before publication of this version of the plan. The Council does however acknowledge that the Plan is at a stage where spatial options can be further discussed to ensure that there is a proper understanding and consideration of any potential impacts of development on communities and infrastructure within Mid Sussex.

As we indicated in our previous response to Lewes' Issues and Options consultation on 10th September 2021, this Council is already planning for significant levels of housing growth up to 2039. This level of growth will have a significant impact on the district's infrastructure capacity. Therefore, the Council will need to be confident that sufficient infrastructure capacity exists to meet our housing need in the first instance. The full impact of any proposals you may have on Mid Sussex's

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infrastructure (including planned/ future growth in Mid Sussex itself) will need to be assessed and planned for accordingly.

The Council was surprised, on the 7th of February, to receive further correspondence given you are in your Regulation 18 consultation period requesting this Council to consider unmet development needs arising from Lewes district. This Council are aware of your housing need and supply position as a result of the ongoing work with the West Sussex and Greater Brighton Board (of which we are both members) to seek strategic options to meeting unmet housing need in the sub-region.

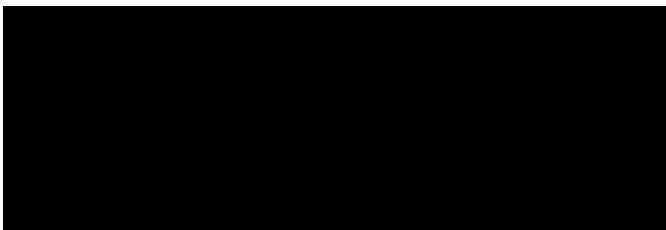
In reviewing the adopted District Plan, the Council has robustly considered how we could make a contribution towards unmet need. As you are aware, a submission draft District Plan 2021 – 2039 was published for Regulation 19 consultation in January 2024. As you will be aware, following robust work, this Council can meet its housing need in full with an over-supply of 996 dwellings for resilience and contribution towards unmet need arising in the area. This is a supply-led figure based on an extensive and robust site selection process.

Both the Council's Strategic Housing Market Area Assessment (SHMA) and work commissioned by the West Sussex and Greater Brighton Board identify the Northern West Sussex Housing Market Area (NWSHMA) comprising Crawley, Horsham and Mid Sussex as our primary HMA. The NWSHA authorities have an agreed Statement of Common Ground which states that any over-supply will be prioritised for this HMA. Therefore, given the level of unmet need arising in the NWSHMA and the over-supply proposed within the submission draft District Plan, this Council will not be able to contribute towards unmet needs arising in Lewes district.

Finally, the Council welcomes the continued protection of the Ashdown Forest in the Plan. Lewes and Mid Sussex District Councils and other affected neighbouring Councils, have to date worked successfully to implement mechanisms to protect the Ashdown Forest. We look forward to continuing to work in partnership on this and other matters.

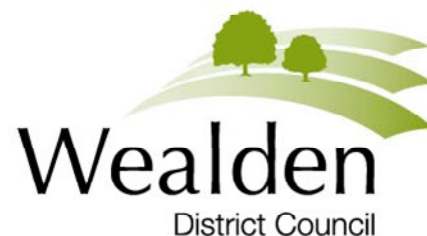
The Council is committed to engaging positively with Lewes District Council on major cross boundary issues and we look forward to meeting with you in the very near future.

Yours faithfully,



Cllr Robert Eggleston
Leader

OUR REF: NW/dp
ASK FOR:
DATE: 25 April 2024
YOUR REF:



By email

Head of Planning Policy, Economy &
Climate Change

Dear Sir/Madam

Wealden District Council Local Plan - Duty to Cooperate

Wealden District Council (WDC) has commenced work on a new Local Plan and has undertaken an eight-week early consultation¹, named the 'Direction of Travel' consultation, which concluded on 18 January 2021. The Council has since updated its Local Development Scheme (LDS)² in January 2024. This identifies that the Council will publish and consult upon the Wealden draft Local Plan (Regulation 18) in March 2024, which has been undertaken. WDC then expects the publication of the Proposed Submission Local Plan Document (Regulation 19) to take place in the early part of 2025, with the Plan itself being submitted to the Secretary of State shortly thereafter and at least by 30 June 2025.

As with a number of Local Planning Authorities (LPAs) in the South East, one of the biggest challenges facing Wealden is meeting our own development needs including housing (as set out by the Governments 'standard methodology') against a backdrop of significant environmental, planning and infrastructure constraints. We are writing specifically to your local authority in respect of the matters raised in this letter because our evidence indicates that either our respective Housing Market Areas (HMAs) or our Functional Economic Market Areas (FEMAs) overlap.

Wealden District is a highly constrained authority with over 53%³ of the district being located within the High Weald National Landscape, predominantly in the northern part of the district. The district also contains part of the South Downs National Park (SDNP), with over 7% of the district falling within the National Park area. Thus, together, the High Weald National Landscape and the SDNP cover some 60% of the district, in formal recognition of its landscape quality. The local authority area also contains the Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA), as well as the Pevensey Levels SAC and Ramsar site that are European / internationally designated biodiversity sites. Almost 10% of the district is covered by these sites alongside other Sites of Special

¹ [Wealden Local Plan – Direction of Travel Consultation](#)

² [Wealden District Council Local Development Scheme \(LDS\), January 2024](#)

³ [The High Weald AONB Management Plan 2019-2024](#)

Scientific Interest (SSSI)⁴. There are several other notable constraints in the district such as infrastructure provision (particularly major highway improvements), Ancient Woodland and areas that fall within Flood Zones 2 and 3.

For the draft Wealden Local Plan Regulation 18 consultation document, the calculation for Wealden's housing need requirement under the 'standard methodology', irrespective of constraints, was 1,200 dwellings per annum (dpa)⁵. Over the proposed Plan period from 1 October 2023 to 31 March 2040 this equates to an overall need to deliver 19,800 net new homes.

As you will now from our previous Duty to Cooperate discussions, Wealden has undertaken significant work to identify land with potential for future development and to maximise the number of homes that the district is able to provide. A Strategic Housing and Economic Land Availability Assessment (SHELAA)⁶ has been undertaken to assess the capacity of the district and the extent to which local housing needs can be met. The draft Local Plan (including draft site allocations) has also been through the Sustainability Appraisal (SA) process.

The evidence so far confirms that it is realistic that the draft Wealden Local Plan will only be able to plan for 15,729 (net) dwellings over the plan period at an average of 953 dwellings per annum (dpa). At this stage in the plan-making process, there is a shortfall in housing delivery of 4,071 (net) dwellings, which amounts to a shortfall of 247 dpa. This means that the overall housing supply figure for our Regulation 18 consultation is currently a 'capacity' based figure, based on the level of housing that can be delivered within the plan period, having regard to the identified constraints below:

- Potential highways impacts, particularly around the A22 and A26 corridor, which will likely constrain growth in the south and north of the District respectively, particularly around Hailsham and Uckfield and the surrounding areas, accounting for cumulative impacts;
- Flood risk, particularly to the southeast of the District and around urban areas that surround Eastbourne;
- Landscape considerations in relation to the High Weald National Landscape and the setting of the South Downs National Park; and
- Biodiversity designations and habitats across the District.

The above constraints lead to a lack of deliverable sites in sustainable locations within our District. Further details in relation to these constraints is provided within the Interim Infrastructure Delivery Plan, our Sustainable Transport Evidence Base (STEB), Strategic Flood Risk Assessment (SFRA) and Landscape Assessments that accompany this consultation⁷.

In addition, the current evidence base for economic needs⁸ shows between 2023 and 2039 that there is residual requirement for employment need (office, industrial and warehouse) of between 170,398 and 188,894 sqm. The majority of identified residual employment need over the period is for industrial and warehouse uses (i.e. B2 and B8) at 152,831 sqm. We will update our employment figures and evidence base between our Regulation 18 and Regulation 19 stages to align the need with the plan period up to 2040 to account for any new information (including any new commitments).

⁴ Some of these SSSIs are located within the High Wealden National Landscape.

⁵ It should be noted that 'standard method' for the 2024 period can now be calculated following the publication of the [median workplace-based affordability ratios for 2023](#) and this has meant a slight drop to our housing needs requirement to 1,186 dpa.

⁶ [Strategic Housing and Economic Land Availability Assessment \(SHELAA\), February 2024](#)

⁷ Please see our evidence base webpage: <https://www.wealden.gov.uk/planning-and-building-control/planning-policy/wealden-local-plan/local-plan-evidence-bases/>

⁸ [Employment and Economic Study Eastbourne and Wealden, April 2022](#)

The draft Local Plan confirms that there is capacity for the provision of at least 84,850 sqm of employment floorspace under draft Policy SS5 (Provision of Employment Floorspace). This means that there is a potential shortfall overall of between 85,548 and 104,044 sqm of employment floorspace at this time.

It should be noted that given the circumstances set out above, and the stage of plan-making that we are currently at, that we will continue to gather further evidence to refine our Draft Local Plan in respect of the above matters in order to inform the subsequent Regulation 19 consultation stage. In addition, we have opened a further 'call for sites' in order to ascertain whether there are further opportunities within the District to contribute towards our development needs as set out above.

It is appreciated that LPAs are at different plan-making stages and that many of our neighbouring local authorities will be in a similar position in terms of endeavouring to meet their own housing and economic needs. However, under the 2011 Localism Act and provisions of the National Planning Policy Framework (NPPF)⁹ we formally ask whether your authority would be able to meet any of Wealden's unmet housing or economic development needs?

In your response to Wealden, it would be particularly helpful if you could set out the following:

- a) The stage you are at in the Plan making process;
- b) The expected timetable (if known) for the production of your authority's Local Plan;
- c) Whether your authority is in a position to assist in either meeting housing or employment needs, and if possible, to identify how this could be delivered;
- d) If you cannot assist, what the environmental, infrastructure or planning constraints that will prevent you from meeting this development need, and the extent of the shortfall (for both housing and employment floorspace) in your own local authority area.

We would be happy to discuss this request with you further and look forward to hearing from you on this issue in due course. We would be grateful for a response by the 10th May 2024. Please respond to planningpolicy@wealden.gov.uk using the subject line 'unmet development needs'.

Yours faithfully



Nichola Watters
Head of Planning Policy, Economy and Climate Change

⁹ Specifically, paragraphs 11b, 24-27 and 61 of the NPPF.

Contact
01444 477053

Email
planningpolicy@midsussex.gov.uk

Your Ref

Date
16 May 2024

Dear Sir/ Madam,

Wealden Local Plan – Regulation 19 Consultation

Mid Sussex District Council ('the Council') welcomes the opportunity to comment on the Regulation 18 consultation document for the Wealden Local Plan ('the Plan').

At the start of 2024 the Council undertook its Regulation 19 consultation on the Mid Sussex District Plan 2021-2039 and anticipate submission this summer. Whilst the timetables of Local Plan preparation are at different stages, the Council encourages Wealden District Council to continue to engage with its neighbours on identified cross boundary matters as their Plan progresses.

As identified in the Council's response to the Wealden Local Plan - Direction of Travel consultation in 2021, the Council continues to consider there are five key potential cross boundary matters; Transport; Infrastructure; Housing; Gypsy and Traveller accommodation; and Ashdown Forest. The key issues on these matters are set out below.

Transport and Infrastructure

The Council notes that the Plan's Spatial Strategy identifies the A22/A26/A27 corridor as the focus for new employment growth. The Council continues to be broadly supportive of this approach subject to there being adequate capacity within the road network after taking into account planned growth within the Mid Sussex development plan. It is noted that with the potential additional strategic employment allocation (Ashdown Business Park, Maresfield), further highways testing work is required. This is supported given the potential impacts additional development could have on the A22 which intersects the north east corner of Mid Sussex district.

The Council previously noted that Wealden will need to ensure that any infrastructure required to support its growth is properly planned for and delivered, particularly in terms of its location and timing. This is to ensure existing infrastructure, both in Wealden district but also in neighbouring districts, is not put under undue pressure. The Council welcomes the intention of draft Policy INF1: Infrastructure provision, delivery and funding to ensure that there is either existing suitable infrastructure in place to support new development or that improved/ new infrastructure will be delivered in a timely manner. The Council acknowledges the publication of an interim Infrastructure Delivery Plan and that it will be reviewed regularly. The Council continues to welcome the opportunity to discuss potential cross-boundary infrastructure implications resulting from future growth options.

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Housing

The Council notes that, against an overall housing need, the Plan identifies a total housing supply figure of 15,729 (953dpa); a housing delivery shortfall of 4,071 dwellings across the Plan period. The shortfall is stated to be a consequence of specific constraints (highway impacts around A22 and A26 corridor, flood risk and landscape and biodiversity designations and habitats), and the impact on potential development capacity.

The Council welcomes the statement in the Plan that further work, including highway modelling and consideration of any newly promoted sites, is to be undertaken before Regulation 19 which may conclude increased capacity and/or potential mitigation measures to unlock further development opportunities. The Council encourages Wealden to explore all opportunities to maximise growth to address its current identified housing shortfall.

Wealden DC recently approached the Council under the Duty to Co-operate asking for assistance in contributing towards unmet housing or economic development needs. In reviewing the adopted District Plan, the Council has robustly considered how it could make a contribution towards unmet need. As you are aware from our ongoing engagement, the Council's submission draft District Plan 2021 – 2039 indicates that the Council can meet its housing need in full with an over-supply of 996 dwellings for resilience and contribution towards unmet need arising in the area. This is a supply-led figure based on an extensive and robust site selection process.

Both the Council's Strategic Housing Market Area Assessment (SHMA) and work commissioned by the West Sussex and Greater Brighton Board identify the Northern West Sussex Housing Market Area (NWSHMA) comprising Crawley, Horsham and Mid Sussex as our primary HMA. The NWSHMA authorities have an agreed Statement of Common Ground which states that any over-supply will be prioritised for this HMA. With regards to employment and economic needs, the Council's Economic Growth Assessment confirms that the Northern West Sussex area also broadly operates as a Functional Economic Market Area with links to West Sussex and Reigate & Banstead. Links to East Sussex are also present but weaker – despite sharing an administrative border, there are no strong housing or economic market links between Mid Sussex and Wealden.

In light of the above, the Council needs to prioritise assisting the NWS area if potential supply exists. As such, given the unmet need arising in the NWS area, the Council is not be able to contribute towards unmet needs arising in Wealden district.

With regards to the Gypsy, Traveller and Travelling Showpeople community, the Council notes that Wealden will consider if, in light of Government changes to the definition of Gypsy and Travellers in the Planning Policy of Traveller Sites (PPTS), the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) (May 2022) needs updating. Notwithstanding this, the Council welcomes the intention of draft Policies SS3: Gypsy, Traveller and Travelling Showpeople – Accommodation and HO9: Traveller and Travelling Showpeople – Site Criteria, to meet its need within the district.

Ashdown Forest

Ashdown Forest is a strategic matter for both Councils and there are arrangements in place to ensure due consideration is given to issues affecting Ashdown Forest. There is a strategic solution for recreational pressure which ensures the requirements of the Habitats Regulations are met with regard to the in-combination effects of increased recreational pressure on the

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Ashdown Forest SPA arising from new residential development. The strategic solution is a partnership approach between local authorities surrounding Ashdown Forest including both Wealden District Council and Mid Sussex District Council and this approach is supported by Natural England. It is considered that Policy NE5: Ashdown Forest SPA, supported by a Habitats Regulations Assessment (HRA), aligns with the strategic solution and the approach taken by Mid Sussex District Council. It is noted that the HRA concludes that further suitable SANG(s) will be required to mitigate the full amount of growth coming forward in the 7km zone of influence as a result of the Wealden Local Plan. As this hasn't yet been identified, adverse effects on the integrity of the Ashdown Forest SPA/SAC regarding recreational pressure cannot yet be excluded. The Council looks forward to continuing to work in partnership on the Strategic Access Management and Monitoring (SAMM) Strategy and other matters as appropriate to ensure there is a strategic co-ordinated approach to mitigation.

With regards to air quality, it is noted from the HRA that the approach to air quality modelling is consistent with the modelling carried out for the Mid Sussex District Plan. It is also noted from text in the Wealden Local Plan that the HRA has concluded at this stage that the growth strategy set out in the Regulation 18 draft Wealden Local Plan will not result in an adverse impact on the integrity of the SAC and therefore mitigation is not required. The approach taken in Policy NE5: Ashdown Forest SPA is consistent with that taken by Mid Sussex District Council. The Council looks forward to continuing to work together in partnership on air quality matters relating to the Ashdown Forest.

If you would like to discuss any of the above, please contact Natalie Sharp, Senior Planning Officer, [REDACTED]

Yours faithfully,

[REDACTED]

Judy Holmes
Deputy Chief Executive



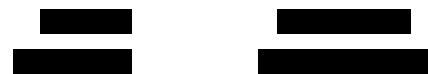
Justin Turvey
Place Development



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Surrey
KT18 5BY

Main Number (01372) 732000
Text 07950 080202
www.epsom-ewell.gov.uk
DX 30713 Epsom

Date 10 July 2024



Email localplan@epsom-ewell.gov.uk

Dear Mid Sussex Council

Duty to Cooperate: Housing Land Supply

Epsom and Ewell Borough Council is progressing with its Local Plan and is now moving towards the Regulation 19 stage in the plan making process. To support this, we have been carrying out further work on our evidence base to ensure it is robust and up to date, to help guide and inform the content of the Regulation 19 version of the Local Plan. Part of this work has involved reviewing and updating the Land Availability Assessment (LAA), which is now mostly complete.

We previously contacted you in November 2022 when the first iteration of the [LAA](#) was almost complete, to ask for assistance in meeting some of our housing needs. The government's standard method has identified our housing need be 573 new dwellings per annum, which is 10,314 dwellings across the plan period 2022 to 2040. This represents a significant increase in housing delivery given that our previous Core Strategy housing target was for 181 new dwellings per annum.

The borough of Epsom & Ewell comprises either urban areas or Green Belt land and the LAA had shown the availability of sites to be extremely limited, with the urban areas being only able to accommodate 37% of the housing need generated by the standard method. In accordance with the planning practice guidance, where insufficient sites / broad locations to meet need are identified, we have revisited and updated the LAA. This has involved:

- Another Call for Sites exercise.
- Contacting all landowners again to confirm availability of sites.
- Reviewing 2022 LAA sites against any updated evidence (for example any changes to the Environment Agency's flood zones).
- Reviewing estimated capacities of individual sites (seeking to optimise yields).

- Reviewing current planning applications/refusals/pre-applications.
- Updating the windfall allowance based on past trends – to include an allowance for small (1-4) and medium (5-19) windfalls.
- Updating the trajectory.

The LAA update has shown that potential supply in the urban area of the Borough has reduced slightly, with the identified urban sites being capable of accommodating 33% of the calculated need generated by the standard method. This reduction is primarily due to sites not being confirmed as available by the landowners.

It should be noted that Green Belt sites, which have been promoted through the various Call for Sites exercises, have been included in the LAA to ensure comprehensiveness and completeness. However, they have not been included in the housing supply calculations as this requires the demonstration of exceptional circumstances. To demonstrate the severity of the borough’s housing supply position, the table below shows what the situation would be if all the Green Belt sites submitted to the Council were to be included, regardless of their suitability or the need to demonstrate exceptional circumstances. It is clear there would still be a significant shortfall in the housing land supply against the need generated by the standard method.

Type of Site	% of housing need as per the standard method	Unmet need against the standard method
Urban sites (assessed as being deliverable and developable)	33%	6,910 (67%)
Green Belt sites (all sites promoted through the Call for Sites exercise)	45%	-
Total	78%	2,269 (22%)

As such, in accordance with current national policy and the duty to cooperate, we are once again writing to our neighbouring authorities, wider Surrey authorities, those within the same housing market area and those who may not be constrained by Green Belt designations to seek assistance in meeting our unmet need. We are keen to understand whether anything has changed with your own housing land supply position since we last wrote to you in November 2022, which would enable you to assist us?

In addition to housing need, we are also in a challenging position in relation to meeting our Gypsy and Traveller accommodation needs. Since the government’s change in definition of a Gypsy or Traveller, our need has risen from 10 additional pitches to 18 additional pitches¹. We are exploring opportunities as to how these needs could be met but are anticipating there being a shortfall. Again, we wrote to you previously regarding this issue and are keen to understand if your own situation has changed and you are able to offer any assistance in helping to meet this need?

¹ Needs are identified in our [Gypsy and Traveller Accommodation Assessment 2022](#).

If you wish to discuss the content of this request and/or require further details, please let me know and we can arrange a meeting or phone call.

We would be grateful for a response by **Friday 9 August 2024** so that we can consider our Spatial Strategy options in light of the responses we receive.

Yours Sincerely



Justin Turvey
Head of Place Development

Contact
01444 477053

Email
planningpolicy@midsussex.gov.uk

Your Ref

Date
05 August 2024

Dear Justin,

Duty to Cooperate: Housing Land Supply

Thank you for your letter of 10 July 2024. Please see below Mid Sussex District Council's response to your enquiry on the ability of Mid Sussex to assist Epsom & Ewell Borough Council in meeting its unmet housing need.

Mid Sussex District Plan (2021-2039)

As you may be aware, on the 8th July 2024 Mid Sussex District Council ('the Council'), submitted its draft Mid Sussex District Plan (2021 – 2039) ('the Plan') to the Planning Inspectorate. Further information on the submission, including the Council's evidence base and updates on the examination, can be found on the Council's [District Plan Review webpage](#). You can also receive updates automatically by signing up to our e-communication (link at the bottom of the above weblink).

Policy DPH1: Housing of the submission draft Plan identifies a local housing need of 19,620 dwellings (equivalent to 1,090 dwellings per annum (dpa)). In reviewing the adopted District Plan, the Council has undertaken an extensive and robust assessment of potential sites for allocation. Consequently, DPH1 shows that the Council is able to meet its housing need in full with an oversupply of 996 dwellings for resilience and contribution to unmet need arising in the area.

As set out in our letter to you in December 2022, Mid Sussex, Crawley and Horsham form the Northern West Sussex Housing Market Area (NWSHMA) and the Council's primary HMA; confirmed by the Council's Strategic Housing Market Area Assessment (SHMA) and work commissioned by the West Sussex and Greater Brighton Board. The NWSHMA authorities have an agreed Statement of Common Ground which states that any over-supply will be prioritised for this HMA. The Council's SHMA does not identify any housing market links with Epsom and Ewell. Therefore, given the level of unmet need arising in the NWSHMA and the over-supply proposed within the submission draft District Plan, this Council will not be able to contribute towards unmet needs arising in Epsom & Ewell borough.

With regards to Gypsy and Traveller needs, the Council's position set out in the December letter remains unchanged. The pitch need identified through the Council's Gypsy and Traveller Accommodation Assessment (GTAA) (2022) of 16 permanent pitches (outside of the South Downs National Park (SDNP)) is to be met through existing commitments and the proposed Significant Site DPSC3: Land to the South of Reeds Lane, Sayers Common. The GTAA identified a need for four pitches within the SDNP. Given the geographical context of the GTAA, if the Council were able to sustainably meet any unmet pitch need it would likely prioritise that of the SDNP and/ or immediate neighbouring authorities.

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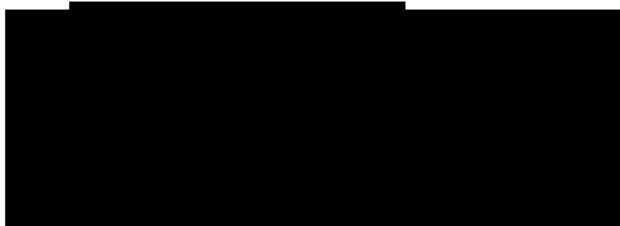
Judy Holmes
Deputy Chief Executive

Chief Executive - Kathryn Hall



If you would like to discuss any of the above, please feel free to contact myself or another member of the Planning Policy Team.

Yours faithfully,



Principal Planner
Planning Policy

