



South East Plan Examination in Public

Matter 8G: Gatwick Area Sub-Region

Sub-Matter 8Gii: Housing and Environment

**Participant statement of case on behalf of
Mid Sussex District Council**

Respondent number 7697

1.0 *Is the proposed housing provision for the sub-region at the most appropriate level, having regard to social, economic, and environmental considerations?*

- 1.1 The level of housing proposed for the sub-region in Policy GAT2 of the South East Plan (**SEP1**) (1,650 homes per year) is accepted as the maximum level of housing the area should take to achieve the Vision for the sub-region (as set out by West Sussex County Council in Paper 2 (**SEP18**)). This requirement represents a significant pressure on the sub-region and can only be sustainably accommodated if the necessary community, transport and service infrastructure is provided with the development.
- 1.2 For Mid Sussex the level of housing required by Policy H1 of the draft South East Plan (**SEP1**) is already slightly greater than the current requirement for the district set out in the West Sussex Structure Plan. Due largely to environmental pressures, infrastructure deficits and problems (particularly sewerage and transport infrastructure) and the non-release of land by network rail and the local NHS trust, delivery has not kept pace with the housing requirement. Consequently, with a backlog of housing requirement and an increased requirement the pressures on the district are enormous. Any further increase in the housing requirements for the district would be unacceptable and unsustainable.
- 1.3 However, the Council is committed to working with all parties to resolve issues. The Council is currently implementing large scale allocations in Haywards Heath, tied up with the delivery of a relief road for the town. It is also about to go to examination on its Small Scale Housing Allocations document for the period up to 2016, prepared in conformity with the West Sussex Structure Plan. The Council is also progressing an Area Action Plan for large scale mixed use development at East Grinstead with a relief road and comprehensive transport package and is also preparing a Core Strategy for the period to 2026.
- 1.4 Higher levels of growth would have severe implications for the environment and character of the sub-region and would be very difficult to accommodate due to issues relating to deliverability, lead-in times and infrastructure requirements.

- 2.0 *Is the target that 40% of new housing should be affordable justified and appropriate (Policy GAT3)? Is it capable of being achieved?***
- 2.1 The Council recognises the importance of affordable housing and the need to significantly increase the stock within the district and sub-region. **The 2004 Housing Requirements Survey** (available from the EIP Document Centre) which was undertaken for the Mid Sussex by David Coutties Associates (DCA) estimated the annual affordable housing need as 551 new homes.
- 2.2 The majority of affordable homes achieved in the district are through S106 agreements on mixed tenure sites. The Council has an adopted policy which requires a reasonable proportion of affordable housing (generally 30%) of the total number of dwellings to be provided within developments of 15 or more dwellings. In addition to re-lets, over the last two years only 171 new affordable homes have been completed in the district. This is far below the estimated affordable housing need and also the target of 40% on Policy GAT3.
- 2.3 If 40% were to be applied to the total South East Plan housing requirement for Mid Sussex 282 affordable homes could be achieved each year. This compares to the estimated need of 551 dwellings per year. The argument sometimes put that the solution is to build more homes would not solve the affordability problem in this area. The DCA Housing Requirements Study showed the house prices in Mid Sussex to be higher than elsewhere in West Sussex and the South East. Building more homes would not present a solution for those unable to compete in the open housing market. If anything, it would contribute to the level of commuting both in and out of the area as people able to afford to live in this attractive part of the South East moved in. The solution to the shortfall in affordable homes is not to increase the overall housing requirement for the area and thereby comprise environmental and other infrastructure requirements.
- 2.4 Although the Housing Needs Survey presents an aspirational need, the gap between need and potential supply is so wide that it is self evident that the planning system alone cannot solve the affordable housing problem, although it has a useful role to play.
- 2.5 Although the 40% target is clearly justified in order to achieve 40% affordable housing as a proportion of all new housing development, significantly more will be needed on the schemes which can contribute to make up for those which cannot meet all or part of the requirement. As the provision of virtually all necessary infrastructure is down to developers to provide, there are concerns that 40% is not achievable. The Council is also concerned that to set a very high requirement could frustrate and delay the delivery of housing development generally. However, in its new Core Strategy the Council will include an affordable housing policy which should result in more affordable homes than are currently achieved.
- 2.6 The Council agrees that the target of 40% is justified but does not believe it is achievable in Mid Sussex. Where, in other parts of the sub-region, a much higher proportion of affordable housing is achievable, without compromising the creation of a balanced community, this is welcomed. However, affordable housing should not be so heavily reliant on developer contributions and there is a clear need for more resources to be put into providing affordable homes in the sub-region, as part of the wider solution to infrastructure provision. This should be reflected in the Regional Housing Strategy.

3.0 *Is the proposed apportionment of the overall housing provision to the Districts at the most appropriate level, taking account of social, economic and environmental factors?*

- 3.1 The Council has contributed to, and supports, the work undertaken by West Sussex County Council in apportioning housing figures to the districts and endorses the comments made by the County Council in its statement on sub-matter 8Gii3 setting out how the apportionment was reached.
- 3.2 The Council has not objected to the distribution per se but has expressed, and continues to raise, concerns about the level of housing growth, the need for it, its impact on the environment and the need for infrastructure. This amount of housing (14,100 homes over 20 years) and associated growth will be difficult to accommodate without adversely impacting on the essentially rural character of the district and the quality of life of its residents. Critical to the delivery of this level of housing is the need for substantial central Government funding, to supplement the contributions made by developers, to ensure the appropriate and timely provision of infrastructure.
- 3.3 The Council welcomes the absence of any specific locations being identified in the South East Plan for the additional housing distribution it has to take within the district. This new housing requirement will be most appropriately planned for, at the local level, through the Local Development Framework and will be in addition to progressing the existing commitment in the Mid Sussex Local Plan and West Sussex Structure Plan.
- 3.4 The South East Plan requirement for Mid Sussex is very high and any increase will be strongly resisted in the light of environmental concerns, impact on the existing settlement pattern and the need for, and impact of, significantly increased infrastructure to meet the needs of both existing and new residents.

- 4.0 *How should the potential of transport corridors, including their relationship with adjacent sub-regions and with London, be taken into account in the spatial strategy (Policies GAT1 and GAT2)?***
- 4.1 In terms of transport corridors within and through the sub-region the north/south rail and road routes are generally stronger than those east/west. However, in considering the potential of transport corridors, the Council believes investment is needed to improve the current ability of the network to cope with the pressures on it and certainly to cope with increasing growth. The Revised South East Plan Implementation Plan (**SEP1b**) Annex 3 – 3.9 sets out the known transport needs. Much of this investment is needed for safety measures and also to allow for existing development commitments. However, developer funding will not be able to meet the total investment required and direct investment from Government is required.
- 4.2 The transport infrastructure requirements for both road and rail networks are set out in the Council's statement on sub-matter 8Giii.
- 4.3 Development potential of the towns in Mid Sussex is, in each case, dependent on transport improvements and effective links from the new developments into the towns and into the main transport corridors, both road and rail.
- 4.4 The Council supports the view expressed by West Sussex County Council (Statement on Matter 8Gii (7246)) that the direct link between economic performance at Crawley/Gatwick and the performance of the coastal economy is not as significant as was assumed by some. Economic links and travel to work links are weaker between Crawley/Gatwick and the coast than the linkages between Brighton and Hove and the coastal towns. However, the Council also accepts the importance of maintaining and/or improving key north/south communications links between the Sussex Coast and both Gatwick and London, as set out in the sub-regional strategy for the Sussex Coast Draft South East Plan (**SEP1**) policy SCT2iii)
- 4.5 Generally, improvements to the transport network, and to the main transport corridors in particular, would assist in enabling new development to function more effectively.

5 .0 *How should the uncertainty regarding expansion of Gatwick be reflected in the housing distribution?*

- 5.1 Policy T9 of the South East Plan (**SEP1**) states support for the development of Gatwick and Heathrow Airports within currently agreed levels of growth. With this very clear policy approach to expansion of Gatwick it would not be appropriate to take a different view regarding housing strategy.
- 5.2 The Gatwick Interim Master Plan 2006 (**BAA6**) predicts fewer jobs both on and off airport by 2015 than in 2001 and that it is likely there will be a slight reduction in the proportion of economically active in the sub-region whose jobs are dependent on the airport. (See the Council's statement on sub-matter 8Gi paragraph 4.4)
- 5.3 Should the Government's on-going work indicate that a second runway is needed at Gatwick Airport, the implications are likely to trigger a review of the sub-regional strategy and possibly the South East Plan more widely.

6.0 *Has sustainability of developing Green Belt land for housing and mixed uses been properly considered?*

- 6.1 Although small areas of land in the north part of Mid Sussex abut greenbelt in Tandridge none is included within the district.
- 6.2 No comment is made on the consideration of greenbelt land within Surrey other than to emphasise how important it is, to the supply of housing in the sub-region, that opportunities for appropriate development within the greenbelt are identified.

7.0 *Is the approach to Strategic Gaps properly justified (Policy GAT1)?*

- 7.1 The maintenance of the settlement pattern, as referred to in the sub-regional strategy, is critical to maintaining the attractive character of the sub-region and to protecting the environment. As set out in the Council's statement on matter 8Gi the environment is itself an important economic asset. Compromising the setting of settlements and eroding their individual identity would work against economic, environmental and social objectives. Recognising the role of strategic gaps is, therefore, a key component of the spatial approach to development in the Gatwick Area Sub-Region.
- 7.2 This approach does not prevent development where it is appropriate and it does not conflict with developing potential within the main transport corridors. However, it should be used to prevent development which would result in coalescence of settlements, ribbon development and urban sprawl caused through coalescence. It is important to appreciate that cumulative erosion of strategic gaps can lead to both physical coalescence and perceived coalescence and that the latter is, in itself, harmful to the identity of settlements.
- 7.3 The Council fully supports the importance of a strategic gap policy in the South East Plan. However, the Council objected to the strategic gap policy C10b of the South East Plan (**SEP1**) on the basis that the criteria, regarding the size of settlements to be separated and the size of the gap, are too stringent. For Mid Sussex, two strategic gaps are identified in the West Sussex Structure Plan (**SP2**) which are contrary to South East Plan Policy C10b. In both cases, these gaps are very important to the setting of the particular towns and villages. However, the boundaries of these gaps will be re-examined through the appropriate Local Development Documents.
- 7.4 In the light of the above the Council believes that the approach to strategic gaps as set out in policy GAT1 is properly justified.