

**Contact:**

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15<sup>th</sup> February 2022

The Rt Hon Michael Gove MP  
Secretary of State for Levelling Up, Housing and Communities  
Department for Levelling Up, Housing & Communities  
2 Marsham Street  
London  
SW1P 4DF

Dear Secretary of State,

**Standardised housing methodology and the delay in the publication of revisions to the Planning White Paper**

Congratulations on your appointment as Secretary of State.

I am writing to express the very grave concerns of Mid Sussex District Council about the implications of the standardised housing methodology and the delay in publishing revisions to the Planning White Paper.

Mid Sussex supports the Government's Plan led approach to the delivery of sustainable growth which secures the crucial infrastructure. After years of speculative development this Council secured a District Plan in 2018. Since then, we have taken more growth than any other Council in Sussex. We have already permitted and planned **for over 16,500 new homes up to 2031** including the delivery of 3,500 new homes in partnership with Homes England in Burgess Hill.

We are now required by Government to review our Plan using the standardised housing methodology. This expects Mid Sussex to find a further **7,000 new homes up to 2038**, before the unmet need in the wider area has been considered. This hike in the number of homes we are required to find will make it extremely difficult, if not impossible, to secure a new Plan. Our 5-year housing land supply will quickly dry up resulting once again in unwanted, unplanned, and unsupported speculative development and considerable costs to taxpayers in the process.

Mid Sussex is a rural District characterised by the beautiful landscape of the High Weald AONB and the rolling hills of the SDNP. Over 60% of the District is covered by national designations and when overlaid with the significant growth the District has taken over the last ten years this means the land available for sustainable development is becoming increasingly more challenging and difficult to identify.

The Government's desire to focus development on brownfield land, in a rural District, is becoming an unrealistic aspiration. Whilst the Council has made considerable effort to make the best use of brownfield sites, only 8% of land in the District lies in our three towns and there is not sufficient developable land to meet the Government's housing targets.

*Working together for a better Mid Sussex*

Councillor Jonathan Ash-Edwards  
Leader of the Council



Mid Sussex and the wider South East is also characterised by physical infrastructure constraints and, as you know from a letter to you of 7<sup>th</sup> January 2021 from the Leaders in West Sussex, this includes a lack of water which has halted all development (housing, commercial and economic) and plan making in much of the County.

I and other Leaders in Sussex are concerned that the standard method is flawed in two key respects:

- Household Projections should not be used as part of the methodology; and
- affordability measures

**Household projections are simply not an accurate reflection of local 'need.' The Standard method uses out of date household projections** despite more recent projections being available. **This makes a significant difference for Mid Sussex and would reduce our need from 18,587 to 12,959. It is highly probable that at the higher figure, Mid Sussex can not achieve a reviewed Plan with community support, but at the lower figure I am confident we could.**

In our response to the Department's consultation in 2020, this Council suggested moving away from the volatile ONS Household Projections data to using existing housing stock as a starting point for assessing need. This would lead to a more proportionately distributed housing need.

Although household affordability is an important issue, the use of workplace-based median house price to median earnings ratio is not reflective of the situation in Mid Sussex due to the high levels of out commuting and the impact this has on the earnings of our residents.

A more effective way to address housing affordability would be to support the aspirations of Mid Sussex to improve opportunities for high GVA jobs within the District. The District Council is proposing an allocation for a 50ha Science and Technology Park capable of providing for 2,500 jobs. The work on delivering this proposal could be accelerated if the government invested in the necessary highway's infrastructure along the A23.

In light of this position, I request that the Government complete its review and reset the standard methodology at a matter of utmost urgency. If the review cannot be undertaken in a timely fashion, then I would suggest that the government supports Councils in pausing plan making **and** for the presumption in favour of development to be lifted to enable our work to progress without the threat of speculative, unplanned, and unwanted development hanging over our community.

Finally, I would like to extend a warm invitation to you to visit Mid Sussex so that we can show you the significant infrastructure-led growth that the District Council has been proactively delivering, as well as discussing the constraints and challenges and how we can move forward in ensuring Mid Sussex continues to have an up to date Plan.

Yours sincerely,



Councillor Jonathan Ash-Edwards  
Leader of the Council

cc: Rt Hon Stuart Andrew MP, Minister for Housing  
Mims Davies MP, Member of Parliament for Mid Sussex  
Andrew Griffith MP, Member of Parliament for Arundel and South Downs  
Jeremy Quin MP, Member of Parliament for Horsham