

Reforms to National Planning Policy – Consultation (December 2022 – March 2023)

Mid Sussex District Council Response to Key Consultation Questions



Chapter 3 – Providing Certainty through Local and Neighbourhood Plans

Q.1: Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) for as long as the housing requirement set out in its strategic policies is less than 5 years old?

Mid Sussex District Council supports this proposal. We agree with the Government that the planning system should be plan-led. A plan-led system provides certainty for communities and infrastructure providers on the quantum and locations for future growth.

The Council recognises the importance of planning for sufficient homes to meet local needs. This Council commits considerable resources to maintain an up-to-date Local Plan. The Council has an adopted District Plan and Site Allocations DPD which demonstrate how Mid Sussex will meet its housing need in full with an over-supply for contingency and resilience to 2031. In addition, Mid Sussex has been able to demonstrate a 5-year supply of housing since it adopted the District Plan in 2018.

However, Local Planning Authorities (LPAs) have very limited tools to ensure the delivery that it has planned (e.g., planning permissions and allocations) is delivered in a timely fashion by the development industry. This Council has adopted best practice and has reduced the number of pre-commencement conditions imposed on developers and has tightened the time limit for implementation of permissions. In addition, we enter into Planning Performance Agreements to ensure timely consideration and determination of our larger site allocations.

The requirement to continually demonstrate a 5-year housing land supply, and the sanctions imposed if this cannot be demonstrated, unreasonably punishes LPAs that have made sufficient land available through the plan-making process to meet housing need.

The current 5-year supply requirement increases the risk of unplanned and speculative development occurring despite LPAs positively planning for growth which has the potential to exacerbate and worsen infrastructure capacity issues.

Finally, defending 5-year supply-based appeals, despite an up-to-date Local Plan in place, are resource intensive and not an efficient use of taxpayers' money.

The Council therefore agrees that Local Authorities should not be required to demonstrate a 5-year supply of housing where the Local Plan is still in-date (i.e. less than 5 years old).

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Q.2: Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

The Council agrees that the 5/10/20% buffers which currently form part of the housing land supply calculation should be removed.

The intention of a 5% buffer was to ensure choice and competition in the market for land. The Council's Site Allocations DPD meets residual housing needs within the district but also provides for more dwellings than the residual housing requirement as a contingency to secure protection against potential delays to delivery or reduced yields at application stage. In addition, the Council recognises that, to boost the supply of housing, Local Plan housing requirements are a minimum rather than maximum. There is therefore no need to impose an additional 5% buffer.

The intention of 10% buffer penalises LPAs that wish to demonstrate they have a 5-year supply through an annual position statement or recently adopted plan and I refer to the response to Q1.

The 20% buffer, applied where there has been significant under-delivery of housing over the previous three years, is a blunt tool which fails to consider the reasons for failure of delivery which can often be outside the control of an LPA as noted in the response to Q1. The application of the 20% target often leads to an increase in speculative development.

Finally, the inclusion and application of 5YHLS buffers are confusing to communities who perceive this as a tool for the government to increase housing requirements.

Q.3: Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on, or is there an alternative approach that is preferable?

An over-supply of homes early in the plan period should be taken into consideration in the 5YHLS calculation.

When preparing a Local Plan, a housing trajectory (based on build-out rate evidence) is required. Inevitably, some sites will deliver very quickly whereas some require significant pre-commencement work before completions can be expected. In addition, large strategic sites will complete over a much longer timespan. The delivery trajectory is therefore never a straight line.

The 5YHLS calculation should therefore allow over-supply (i.e. delivery faster than anticipated) to be accounted for. Such an over-supply means that short-term housing need is being met, and therefore there should be no further sanctions on LPAs. As described in our response to Q1, this risks unplanned and speculative development which provides uncertainty for local communities and infrastructure providers.

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The Council also considers that, in situations where the housing requirement is higher than local housing need (e.g. where an authority is seeking to contribute towards unmet need arising elsewhere) over-supply should be measured against the local housing need (as established by the Standard Method or other such method as agreed through examination) rather than the housing requirement.

Q.4: What should any planning guidance dealing with oversupply and under supply say?

Planning Guidance should be very specific about the period to which over-supply is applicable.

It is assumed that it relates to any over-supply within the current plan period, rather than looking further back (e.g. into previous plan periods which may have had different housing requirements) however this will need clarification so that the 5YHLS calculation remains factual rather than open to challenge.

The Council agrees with the wording in paragraph 11 b(iii) which refers to the number of homes permitted compared to the housing requirement, as permissions (rather than delivery) are within the Council's control.

Q.5: Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

Mid Sussex has full coverage of Neighbourhood Plans, with 19 'Made' and 1 further plan subject to referendum in May 2023. This demonstrates this Council's commitment to Neighbourhood Plans and the importance of these to our local communities.

The Council agrees with the proposed changes to paragraph 14 which would provide more weight to Neighbourhood Plans in circumstances where the presumption in favour of sustainable development would apply – subject to the Neighbourhood Plan continuing to be in general conformity (and not in conflict) with more recently adopted strategic plans.

Chapter 4 – Planning for Housing

Q.6: Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

The Council agrees that the planning system should be plan-led. Local Plans provide the most certainty for communities and infrastructure providers by setting out the quantum, location, and timing of growth over the plan period. It allows development to be planned strategically, ensuring it occurs in a sustainable manner and with the necessary supporting infrastructure.

The council agrees that it is essential that plans should not only consider housing but that this should be considered alongside other economic, social and environmental needs.

The Council agrees with the changes proposed to paragraphs 1 and 7 of the NPPF to make this aim clearer.

Q.7: What are your views on the implications these changes may have on plan-making and housing supply?

The consultation material sets out a range of concerns in relation to delivery of Local Plans. The Council recognises these concerns, in particular, issues with

- ‘exporting’ the urban uplift to nearby rural authorities,
- the requirement to find more land for homes despite delivery being greater than expected in early years of the plan period,
- the consequences of the Housing Delivery Test despite LPAs doing all it can to facilitate delivery through permissions and allocations, and
- the pace at which some sites are delivered.

The consultation material suggests that housing supply is boosted in areas where there is an adopted, up-to-date Local Plan in place. The Council supports the principle that the planning system should be plan-led, therefore supports the intention to simplify and incentivise plan-making.

The Council supports proposals that will reduce the risk from speculative, unplanned development where sufficient housing has been planned for or permissions granted to meet identified needs. Further detailed comments on these proposals are provided under other questions in this response.

Q.8: Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?

The Council is not opposed to the principle of the Standard Method because it simplifies the planning system. In adopting its District Plan in 2018, this Council spent a total of 10 days at examination hearings debating housing need and subsequent provision in the Plan. The introduction of a Standard Method removes such ambiguity and debate.

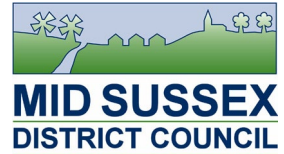
The Council welcomes the proposed changes related to ‘exceptional circumstances’ however, there is concern that this may open significant debate between LPAs and the development industry and slow down plan making.

It is vital that the NPPF and Planning Practice Guidance (PPG) are as clear as possible on the types of local characteristics which could be considered exceptional circumstances when assessing local housing needs so that Local Plans can be prepared with confidence and that the position will not be challenged later in the plan making process.

The Council considers that there are several key local characteristics which should be included as exceptional circumstances in the NPPF and PPG. These are set out below:

- **The economic characteristics of an area.** Mid Sussex is characterised by residents commuting to London and Brighton for highly paid positions. The affordability ratio used in the standard method does not take this into account. This has significant implications for Mid Sussex. **See below.**
- **Demographic characteristics.** Due to specific local demographic circumstances that impact on housing need, this Council should be supported to use the most recent household projections. **See below.**
- **Environmental characteristics of an area.** Mid Sussex is a rural district characterised by its significant valued landscapes, 50% is designated AONB (High Weald) and a further 10% is in the South Downs National Park. The NPPF already recognises that the scale and extent of development within these designated areas should be limited. Furthermore, 40% of the district is characterised by villages and market towns set in the countryside. Only 12% of the district is within a defined built-up area. There are very few opportunities for further growth in our AONB villages. Whilst the NPPF currently indicates that planning policies should contribute to and enhance the natural and local environment it should also state that housing need should reflect these characteristics.
- **Prevailing rural local character.** The district is characterised by villages and market towns. As noted above Mid Sussex is a rural district and settlements ‘sit’ in their landscape setting. Landscape sensitivity and implications for heights and density should therefore be considered an exceptional circumstance.

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Economic characteristics of an area - Affordability

The Council notes that the affordability uplift for Mid Sussex is significant, making up approximately 37% of the district's Standard Method figure. The Council does not agree that increasing housing supply will help improve affordability in attractive areas such as Mid Sussex and this is a point that was argued during preparation of the adopted District Plan and in previous consultation responses on this topic. Despite considerable growth within the district over the past 5 years, with sustained record numbers of household completions, average house prices continue to rise.

Whilst it is recognised that the Standard Method calculation is not due to be amended in relation to affordability and we make no comments on the formula itself, the Council does have concern regarding the data sources used in the calculation.

Planning Practice Guidance currently makes clear that the "Workplace" affordability ratios must be used. This is the ratio between house prices and earnings for those working in the district, regardless of where they live. However, this does not reflect the nature of Mid Sussex where 44% of residents out-commute, the majority to cities such as London and Brighton where wages are higher. This being the case, housing is more affordable than the "Workplace" affordability figures suggest. DEFRA's ["Statistical Digest of Rural England"](#) (August 2022) confirms that average residence-based earnings in rural areas (such as Mid Sussex) are higher than workplace-based earnings because people living in rural areas may work in urban areas in higher paid jobs. The "Workplace" ratio is 13.39 compared to a "Residence" ratio of 11.67.

Therefore, the PPG should be amended to allow "Residence" based affordability ratios in rural areas such as Mid Sussex, where justified by evidence.

Demographic characteristics – household projections

This Council has consistently argued that the 2014-based Household Projections are now very out-of-date and do not form a reliable basis for plan-making by comparison to the latest data. Currently the PPG is very clear that no other projections can be used. This does not allow LPAs any flexibility to use alternative projections where local circumstances demonstrably show they are more appropriate.

The consultation suggests the 2021 Census-based household projections may be used but this will be 'subject to review' and is not due for release until 2024. This provides significant uncertainty for plan making, particularly those that are making swift progress, and this could lead to unnecessary delay.

For Mid Sussex, the Census 2021 data suggests there were 63,300 households in the district in 2021. This is very closely aligned to the 2018-based household projections (62,890). The 2014-based projections, however, are considerably higher (64,776). The latest data clearly represents a more realistic assumption of the number of households currently in the district and therefore forms a realistic basis for estimating likely future need.

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The Council notes that the 2018-based data has been criticised for under-representing migration flows. However, the ONS has released an alternative “High Migration” variant which addresses these criticisms. This provides an up-to-date, robust set of projections which are more reliable than data which will be a decade old at the point of this Council’s examination.

The Council urges the Government to use the most recent projections data, and references to the 2014-based data should be removed from Planning Practice Guidance. The district’s residents expect Local Plans to be based on robust, up-to-date evidence and allowing local authorities to use the latest projections would restore some faith in the process in this regard.

The Council agrees that there should be scope to consider other local demographic circumstances which may impact on housing need. In particular, the components of population change are helpful in demonstrating whether future population growth is driven by natural change (i.e. births exceeding deaths) or migration (for Mid Sussex this is predominantly migration into the district from neighbouring and nearby authority and nearby areas).

According to the latest population projections (ONS Subnational Population Projections, 2018) natural change currently makes up only 11% of population change in Mid Sussex whereas the remaining 89% is due to inward migration, predominantly from neighbouring areas.

By the end of the current plan period (2031) it is estimated that net natural change will be negative (i.e. deaths exceeding births) and therefore net increases in population will be solely driven by migration. LPAs should be able to take these important local factors into account, particularly the principle that the projections ‘bake in’ movements to/from neighbouring areas and therefore contributes towards meeting need from other areas.

Whilst it may not be possible to be exhaustive about these local factors, the PPG should set clear guidance on the types of considerations that would be acceptable in order to provide LPAs with certainty and consistency in their plan making, reduce the length and detail of debate at examination on this matter, and therefore speed-up the adoption of Local Plans.

Conclusion

The NPPF and PPG should be updated to allow LPAs to use the most up-to-date household projections data and affordability data that reflects local circumstances.

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Q.9: Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out-of-character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply maybe taken into account?

Green Belt

The Council notes the proposals with respect to protection of Green Belt land.

Green Belt is a policy designation to prevent coalescence between major settlements. It is not an environmental designation like other protected areas (such as National Parks and Areas of Outstanding Natural Beauty). Whilst the NPPF provides strong protection to designated landscapes such as these, there is greater policy protection provided to Green Belt which is clearly not correct.

Mid Sussex is not within a designated Green Belt and therefore is not directly affected by these proposals. However, approximately 50% of Mid Sussex is within the High Weald AONB, and in adopting the current District Plan, the Inspector considered that to meet housing need development would be required (and could be appropriate) in areas such as AONBs and in open countryside which could threaten the unique nature and character of the district and its settlements.

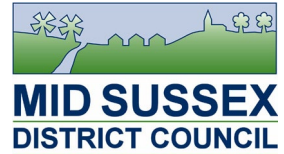
Greater policy protection should be afforded to designated landscapes such as National Parks and AONBs in plan making. These designations should be a major factor when determining the housing need and requirement. Protections should be at least comparable to those provided to Green Belt.

Densities

The Council agrees that local character is important and that building at densities significantly out of character could outweigh the benefits of meeting housing need (i.e. should be an allowable circumstance to not meeting housing need). However, it is unclear how this will work in practice. The NPPF and PPG should be as clear as possible to avoid lengthy debate at Local Plan examinations which can delay implementation of Local Plans and therefore subsequent housing delivery.

Further details regarding the Council's concerns are set out under Question 10.

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Past Over-Supply

The Council agrees that past over-supply should be taken into account when preparing Local Plans. This is particularly relevant where previous plan periods have generated higher windfall or speculative development (where the LPA cannot demonstrate a five-year housing supply) despite having a Local Plan. This unplanned, additional supply should be ‘counted’ as delivering against future need.

Q.10: Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out-of-character with the existing area?

As currently drafted, the revised paragraph 11 is ambiguous and will require accompanying guidance to ensure it is applied consistently. If there is any uncertainty, this will provide significant areas of challenge at examination and could extend examination time and adoption of Local Plans. The Council notes that paragraph 11 b(ii) only provides density as an example of adverse impacts but implies there may be more (it states “may include”).

The Council’s draft District Plan contains a strategic principle to make efficient use of land. In a rural district such as Mid Sussex, despite maximising supply from brownfield sites as a first priority, it is inevitable that greenfield sites will be required for allocation in order to contribute towards housing supply. The yield from greenfield sites is currently determined by surrounding character, compliance with an adopted Design Guide SPD at the same time as maximising supply to support delivery of infrastructure and making efficient use of land - this is a balance that needs to be struck on each individual site. For example, some areas on edge of rural settlements are often low density, however, may be in a suitable and sustainable location with few other constraints which would mean a slightly higher density could be appropriate.

As drafted, paragraph 11 b(ii) is open to challenge. It is unclear how “significantly” out of character is defined. For instance, would a site proposed for 40 dwellings per hectare be “significantly” out of character with a surrounding area of 30dph? Or is the proposal trying to avoid more radical changes in character e.g. taller/denser buildings in an area characterised by low-rise development? This clarity will be essential given it is the only specific example of “adverse impact” provided and is likely to be contentious at examination.

Q.11: Do you agree with removing the explicit requirement for plans to be ‘justified’, on the basis of delivering a more proportionate approach to examination?

The Council agrees that a more proportionate approach to examination is required and the removal of the “Justified” test may assist with this.

Currently, examinations are dominated by technical detail which at times is impenetrable for local communities and favours the party with the most resource. The requirement for local authorities to produce masses of technical evidence can be a barrier to producing local plans, particularly at a time where public service budgets are stretched. LPAs have significantly fewer resources compared to the development industry who are active participants in the plan making process.

However, the Council recognises that there are elements of the evidence base which are vital in order to best understand the impacts (both positive and negative) on local communities, infrastructure and the environment. It is important that the requirement for evidence to support plan making is proportionate rather than requiring detail usually expected at Planning Application stage. If the Test of Soundness is removed it will be important to retain the ‘proportionate’ requirement and this should extend into guidance for Inspectors to ensure a consistent approach is applied across all examinations.

Q.13: Do you agree that we should make a change to the Framework on the application of the urban uplift?

The Council agrees with the principle that homes should be located in the most sustainable locations where development can help to reduce the need to travel, and support making the best use of brownfield land. However, the urban uplift, as currently set out, is not the correct mechanism to achieve this.

As the uplift of 35% is automatically applied to the 20 largest towns and cities without considering local circumstances, there is no certainty that the uplift is deliverable.

Whilst the uplift does not apply to Mid Sussex, it applies to neighbouring Brighton and Hove City Council. Brighton and Hove is constrained by its tight boundary with the South Downs National Park to the north and the sea to the south and were able to demonstrate through the Local Plan process that they could not meet their housing need. This is before application of the 35% uplift.

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The uplift places pressure on neighbouring rural authorities such as Mid Sussex to meet the remaining unmet need. As a rural area, Mid Sussex has different characteristics to a large town or city such as Brighton. For instance, Mid Sussex does not benefit from the same degree of sustainable transport. Therefore, it is not appropriate for unmet need generated by the uplift to be exported to surrounding rural areas.

Whilst the Council supports the changes proposed to the NPPF (paragraph 62) which states “This uplift should be accommodated within those cities and urban areas themselves...” this must be more explicit and state that it must not be exported to neighbouring areas.

Q.15: How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

Urban uplift must not be exported to neighbouring authorities.

The principle of the urban uplift is to maximise opportunities to locate homes in sustainable urban locations where sustainable transport and infrastructure is present. This should be the guiding principle for delivering the uplift. Whilst neighbouring authorities may function as part of a wider economic, transport or housing market for the core town/city, they may not be urban locations therefore not be sustainable locations.

Q.16: Do you agree with the proposed four-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?

The Council welcomes the proposed four-year rolling land supply.

The Council has started work on the review of the District Plan and consulted (at regulation 18 stage) during November/December 2022. The additional flexibility provided by a four-year requirement will allow the Council to continue with its plan preparation, accounting for the revisions proposed by this consultation, without the threat of speculative unplanned development. This provides more certainty for communities and infrastructure providers and facilitates the principle of a plan-led system.

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Q.18: Do you support adding an additional permissions-based test that will ‘switch off’ the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

The Council agrees that the HDT should be revised so that local authorities are not punished when slow delivery results from developer behaviour.

Mid Sussex District Council has consistently achieved good Housing Delivery Test results. This reflects the positive, plan-led approach that the Council has taken to meeting its housing need and the mechanisms used to accelerate delivery. However, as described in the consultation documents, housing delivery is not within the control of the local authority.

The Council supports the additional permissions-based test but suggests this is expanded to include sites that are allocated in the Local Plans/Development Plan Documents. LPAs commit significant resource in preparing plans and accompanying evidence to demonstrate that housing need can be met. The HDT should therefore reflect this commitment to achieving housing need and reduce the threat of ‘the presumption’ applying. This would provide more certainty for communities who, at present, find it difficult to understand how speculative sites can be delivered despite an adopted Local Plan being in place.

Chapter 5 – A Planning System for Communities

Q.30: Do you agree in principle that an applicant’s past behaviour should be taken into account into decision making? If yes, what past behaviour should be in scope?

The Council welcomes the proposals to incentivise developers with allocations and planning permissions to deliver more quickly. It should be developers who bear the burden of slow delivery rather than local authorities and their communities and to restore public confidence in the planning system.

LPAs commit significant time and resource allocating sites to demonstrate how housing need within the area can be met and delivered. At present, despite best efforts to facilitate and accelerate delivery, there are sanctions for slow or non-delivery (such as the 5YHLS/HDT and presumption in favour of sustainable development) which are not within the Council’s control.

The proposal also recognises that delivery trajectories are not always smooth and there may be reasons outside the developer’s control that can slow delivery. There should therefore be scope for local authorities to assess each case on its merits before determining whether sanctions should apply i.e. there should not be automatic revocations/lapsing of planning permission and this should only be at local planning authorities discretion.

Chapter 9 – Preparing for the New System of Plan Making

Q.45: Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?

The Council agrees that certainty should be provided to LPAs that are in the process of preparing Local Plans/reviewing existing Local Plans, to avoid abortive work and to ensure plans and subsequent housing can be delivered in a timely manner.

This Council welcomes the proposal that plans currently progressing through the formal stages can take advantage of policy changes which are due to be implemented in the short-term (i.e. the NPPF amendments) and there appears to be adequate time for such plans to be submitted and examined under the existing legal framework.

However, the Council is unclear, about the mechanism for plans submitted before 30th June 2025 to be examined under the new legal framework (to be introduced in 2024). If there is no such mechanism in place, there is a risk that local planning authorities will delay work on Local Plans until such a point where the new rules will apply. **This requires further clarification and potentially some additional transitional arrangements to allow Council’s currently preparing their plans to be examined under the proposed new system.**

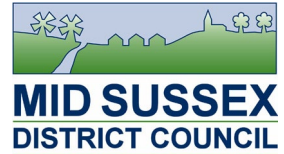
Q.46: Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?

Please see the Council’s response to question 45 in relation to plans currently in progress being examined under the proposed new system, should local planning authorities want to take advantage of the proposed changes.

Urgent clarification is required to provide comfort for local authorities, so that it is clear how plans will be examined and to avoid unnecessary delays in the plan-making process should plans be found unsound or not legally compliant on this matter. Paragraph 11 of the NPPF needs revision now to address these inconsistencies.

The Council is concerned about the proposed changes to the Duty to Co-Operate. The Council recognises that the Government intends to replace the duty to co-operate with an “alignment” test which will be consulted on at a later date, and that this will come into force under the reformed plan-

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making system intended to be introduced in late 2024. As explained in the consultation material, the Duty to Co-Operate will continue to apply for plans currently in progress (i.e. under the current legal framework) until 30th June 2025.

However, there are significant inconsistencies between this proposal and the revised wording in the NPPF which should be clarified.

For example, paragraph 35 seeks to amend the “Positively Prepared” Test of Soundness to delete the requirement for plans to be informed by agreements with other authorities so that unmet need can be accommodated where consistent with achieving sustainable development. Therefore, a plan being prepared under the current legal framework (including the Duty to Co-Operate) will no longer have to meet the test of soundness most closely related to the Duty to Co-Operate. In addition, there are no proposed changes to paragraph 11 of the NPPF which still states that “strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, *as well as any needs that cannot be met within neighbouring areas*”.

This inconsistency will therefore apply for any plan currently in progress to be examined under the current legislation, i.e. any plan submitted before 30th June 2025.

Q.48: Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

The Council does not have any particular concern with the forthcoming proposals for Supplementary Plans however we are very concerned that there will be an automatic withdrawal of current SPDs which could, in effect, remove guidance for longer-term proposals such as those set out in the Masterplans.

Supplementary Planning Documents (SPDs) form an important role in decision making. They are able to add additional guidance and support to the policies adopted in Local Plans. For instance, Mid Sussex District Council has recently adopted a Design Guide, to guide the quality and design of new development across the district, following the same principles on design as set out in this consultation. In addition, the Council adopted a Haywards Heath Town Centre Masterplan SPD to establish opportunities for redevelopment and regeneration of Haywards Heath Town Centre to aid its vitality over the remainder of the current plan period. Two SPDs related to Burgess Hill and East Grinstead town centres remain in force.

The Town Centre Masterplans set out an indicative delivery strategy for implementing the proposals within, with some of these longer-term i.e. likely deliverable towards the end of the plan period. The Council does not have any particular concern with the forthcoming proposals for Supplementary Plans however is very concerned that there will be an automatic withdrawal of current SPDs which could, in effect, remove guidance for longer-term proposals such as those set out in the Masterplans.

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The Council requests that that transitional arrangements are amended to require a review of SPDs, in a similar fashion to those required for Local Plans. This would enable LPAs to determine the elements of current SPDs that remain in-date. For those SPDs that are deemed 'out of date' at this time, they could be automatically withdrawn unless replaced by an equivalent Supplementary Plan prepared under the new arrangements. This would provide longevity to those SPDs that have been recently adopted, are still relevant, and prepared in accordance with current legislation (including significant community engagement and consultation).

Chapter 10 – National Development Management Policies

Q.49 Do you agree with the suggested scope and principles for guiding National Development Management Policies?

The Council agrees with the suggested scope and principles for guiding National Development Management Policies.

In particular, the Council agrees that National Development Management Policies could be prepared on matters such as conserving recognised heritage assets and protecting against inappropriate development in Green Belts to avoid ambiguity. However, such Policies must not stray into matters which are more appropriately developed at the local level taking into account the characteristics of place. This would ensure such policies are standardised and would save local authorities resources in their preparation.

The Council welcomes the intention to consult on the preparation of these policies ensuring that local views can still be taken into account when policies are prepared.