



Mid Sussex District Plan 2021 -2039
Examination

**Matter 6 Housing
Hearing Statement**

September 2024



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MATTER 6: HOUSING

Issue 1: Whether the Council's approach to calculating its full, objectively assessed needs and housing requirement is justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?

Objectively Assessed Housing Need

57. Does the Plan period cover an appropriate time frame for the provision of housing (2021-2039) consistent with national policy? If not, what would be the implications for housing need?

1.1.1 No. The plan period does not cover an appropriate timeframe in the context of paragraph 22 of the NPPF which requires plans to look ahead over a minimum of 15 years. It is noted that the plan will not be adopted until summer 2025 at the earliest, at which point the plan would look ahead for less than 14 years.

58. To determine the minimum number of homes required, housing policies should be informed by the Government's local housing need methodology. As such, are the inputs used to determine the level of housing needed within the Plan appropriate?

1.1.2 Gladman notes that at the time the Regulation 19 version of the plan was produced the inputs used to determine the level of housing need were appropriate.

59. Are there exceptional circumstances to suggest that an alternative approach be taken? If so, what are they, and how would they impact on housing need? Is the Strategic Housing Market Assessment 2021 (H1) up to date and justified?

1.1.3 No, Gladman considers that there are no exceptional circumstances to suggest that an alternative approach should be taken.

60. What are the implications, if any, of the Gatwick Airport's proposed extension and DCO on the demand for housing? Does the OAN set out within the submission Plan of 19,620 remain appropriate?

1.1.4 This is for the Council to justify.

Housing Requirement

67. Is a minimum housing requirement of 19,620 justified and consistent with national policy? What is the status of the 996 dwellings referenced within the table in Policy DPH1 as total under/over supply for resilience and unmet need? Should this figure be included within the annual housing requirement for the district?

1.1.5 The 996 dwellings referenced in Policy DPH1 is a confused figure – does it allow for oversupply for resilience or is it to meet unmet need? If the surplus which has been included is to meet unmet need in neighbouring areas then this should be included in the Council’s housing requirement and should not be dealt with as a ‘buffer’. If this surplus is to instead be a buffer for resilience to ensure housing needs are met in full (allowing for some uncertainty within the supply identified) over the plan period, then this is a different yet fully justified consideration. The surplus cannot deal with both issues and this needs to be clarified.

1.1.6 Gladman further considers that the contingency figure for resilience should be higher and the Council should be seeking to address the unmet needs of neighbouring authorities separately.

68. Are there other considerations that are likely to drive an increase in the homes needed locally, such as any needs that cannot be met within neighbouring areas namely the 30,000 dwellings of unmet need identified up to 2050 in the Coastal West Sussex and Greater Brighton authorities, Housing Need and Requirement Topic Paper (HN RTP) (H5), and the more immediate housing needs of Crawley, Brighton and Horsham?

1.1.7 There is a significant issue in the sub region in terms of housing delivery due to various physical and environmental constraints. Mid Sussex is relatively unconstrained in comparison to other adjoining local authority areas and it should rightly, therefore, be seeking to increase its housing requirement to meet this collective need. Gladman maintains that this can be done in a sustainable manner within the settlements identified for growth under a more robust spatial strategy which should be clearly

identified within the plan. Indeed, there are a number of sites which have been promoted through the local plan process which can assist in meeting this need in sustainable locations.

69. If so, are there any policies within the Framework that protect areas or assets of particular importance that provide a strong reason for restricting the overall scale, type or distribution of housing, within the plan area; or would any adverse impacts of meeting the Council's OAN and the unmet needs of others significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework as a whole?

1.1.8 Gladman considers that although there are constraints (as identified in footnote 7 to paragraph 11 of the Framework) which limit the extent of development in some parts of the District, there are areas where additional sites can be identified to enable the delivery of a higher number of homes which will go some way to meeting unmet needs in neighbouring areas. Gladman considers that adverse impacts can be limited and more of the unmet need can be met by allocating more sites in less sensitive and sustainable parts of the District.

70. Is the requirement for Older Person's Housing and Specialist Accommodation (DPH4); DPH5: Gypsies, Travellers and Travelling Showpeople and DPH6: Self and Custom Build Housing justified and positively prepared?

1.1.9 No comment.

71. What is the housing requirement for each designated neighbourhood area?

1.1.10 No comment.

72. Are any main modifications necessary for soundness, if so, why?

1.1.11 Gladman considers that some fundamental changes are required to the plan to clarify the housing requirement to meet unmet needs of adjoining areas, to increase the buffer to allow for uncertainty in the delivery of sites identified and, as a result, to allocate more of the sites which have been promoted in sustainable settlements

during the plan preparation process. In particular, Gladman's land interests at Land off Scamps Hill, Lindfield and land at London Road, Hassocks.