

**MID SUSSEX DISTRICT PLAN
FURTHER HEARING SESSIONS COMMENCING 25TH JULY
SUBMISSIONS ON BEHALF OF RYDON HOMES LTD**

These submissions are separate to, but sit alongside submissions made on behalf of the Developers' Forum and the Northern Arc Consortium. Rydon Homes Ltd are members of both.

AGENDA ITEM 1 - Un-met need in the Northern West Sussex HMA - Rydon do not agree with the concept of a stepped trajectory. MSDC have not taken a positive approach to the requirement in Paragraph 47 of the Framework to meet the full objectively assessed needs for market and affordable housing in the housing market area. They have consistently sought in the submission plan, at the Examination and in the proposed modifications to keep housing provision to a minimum and to defer provision to a future date. The argument for a stepped trajectory is based on a dis-aggregation of the housing requirement figure between MSDC and Crawley. This is a contrived approach. Mid Sussex District and Crawley District are part of the same Housing Market Area and, by definition, should be treated as a single entity for the purposes of compliance with Paragraph 47 of the Framework. The Examination has heard evidence for higher and lower figures but the Inspector's judgement of an OAN figure of 1026 p.a. should now be accepted and applied to the whole plan period. If anything there is a greater need for delivery in the early part of the Plan Period to build up momentum from a low base caused by underdelivery in the past up to the point where the Northern Arc and other large strategic sites can take over the major part of the housing delivery. A stepped trajectory will restrict the ability of the development industry to deliver housing now when the need is keenest because of latent un-met housing need arising from historic under-delivery.

AGENDA ITEM 2 - The Five Year Housing Land Supply – Rydon consider that the supply should be calculated on the basis of a housing requirement of 1026 dpa throughout the plan period and assessed on the Sedgefield method with a 20% buffer because of historic underdelivery and underperformance during the first 3 years of the Plan Period. The sooner the situation is addressed the better. Deliverable land supply should not be a constraint on the industry's ability to deliver the housing required. Any possibility of under-provision should therefore be avoided.

AGENDA ITEM 3 – Distribution of numbers of dwellings to individual settlements – Rydon welcome the acceptance of the need to provide more certainty of housing numbers for individual settlements to assist in the preparation of Neighbourhood Plans. They also generally agree with the settlement hierarchy but

still feel that Hassocks should be elevated in the hierarchy because it is the only Category 2 Settlement with a main line railway station to London, Brighton and Gatwick which are major employment and leisure destinations. However, the minimum housing requirement should be based on 1026 dpa throughout the Plan Period and the arithmetic and methodology in the relevant spatial distribution tables needs to be re-visited. For example, in Appendix 1 to MSDC 8c the requirement for Hassocks of 907 dwellings at Stage 1 is reduced to 685 at Stage 2 (policy on) for no apparent reason. The minimum provision figure for the period 2014/2015 – 2021/22 in the Stage 2 Distribution table of 322 appears to be arithmetically unrelated to any other figure and the residual figure of provision to find, is again arithmetically incomprehensible and relates to a period 2017/18 – 2030/31 which is a different period and overlaps with the Stage 2 period. The removal of a stepped hierarchy and the introduction of a simple methodology of requirement for the Plan Period, less existing commitments leaving a balance to be provided over the Plan Period is preferable. The requirement for Hassocks should be a full share of the Districtwide requirement of 1026 dpa in recognition of its status as the most sustainable of the Category 2 settlements.

The conclusion in MSDC 8c that Neighbourhood Plans do not need to be reviewed within the next 5 years is inaccurate and misplaced. When the final housing requirement is confirmed, Neighbourhood Plans will play an important part in the delivery of the additional housing numbers that are required. Notwithstanding this, the District Plan should only set out the overall position. The need to review Neighbourhood Plans should be considered in the individual circumstances of each case rather than being the subject of a generalised assertion in the District Plan. Neither should it be any objective of the Plan to seek to avoid the need for the review of Neighbourhood Plans. Hassocks Neighbourhood Plan has been stalled to await guidance on housing numbers from the District Plan and a considered and effective housing requirement for the whole plan period is necessary, reflecting potential yields from SHLAA sites, further potential sites and, most importantly, the status of Hassocks as a sustainable location for new housing. An unconstrained figure of over 900 dwellings, as indicated in MSDC 8c, would seem appropriate.

AGENDA ITEM 4 - Ashdown Forest – It is doubtful that the current state of knowledge will allow a clear position on this issue to be adopted and a contingent approach is probably all that can be achieved. It is important that potential impacts are not over-stated and that the relative importance of competing interests is correctly balanced.