

Mid Sussex District Plan Examination

Hearing Statement – Matter 2: Housing supply and headroom

On behalf of B.Yond Homes Ltd (formerly Rydon Homes)

(Response ID: 1189677)

February 2026

2. Housing supply and headroom

Whether enough housing land has been allocated to ensure that, along with existing permissions and commitments, enough housing land will come forward to meet the housing requirement through the life of the plan and that a 5 year housing land supply will be maintained.

- a) Anticipated housing supply over the plan period
- b) The amount of potential supply headroom over and above the housing requirement
- c) The supply trajectory over the plan period
- d) The potential for lower than anticipated supply arising from delivery impediments, longer lead in times and slower build out rates
- e) The resilience of the plan against such contingencies
- f) The 5 year housing land supply position at adoption
- g) The ability to maintain a rolling 5 year housing land supply

1. No – it is not clear that sufficient housing has been identified to meet the housing requirement.
2. Notwithstanding the concerns set out in our Regulation 18 and Regulation 19 representations that the housing requirement for Mid Sussex should be higher than is being planned for (the supply of deliverable sites within the district is actually greater than is being accounted for), there is potential for more non-strategic scale sites, over a wider number of settlements, to be allocated which would negate the Council's considered need for a stepped housing requirement. It would also have the benefit of bolstering the resilience of the Plan – it is evident from the detail that has been provided in January 2026 Housing Topic Paper (ref: MS-TP2) that from approximately Yr6 onwards, supply is largely going to relate to the strategic allocations and the remaining delivery of existing allocation such as north Burgess Hill.
3. As a result, save from windfall development, there will be relatively little choice as to the location of new housing being delivered in the district – all at strategic scale, with a large proportion around Burgess Hill (including the existing allocation DP9 to the north, with DPSC1 also). The NPPF is clear that opportunities to support rural communities and local services should be taken, which in our view, would be providing for appropriate levels of housing in a wider number of settlements, especially after Yr 6 of the plan period. There is opportunity to do so with the deliverable sites that are available within the district. Supply could and should, therefore, be increased as a result.
4. In addition, from Year 6 onwards of the Plan, it is difficult to determine whether the assumptions made with regard to delivery (trajectory) of the key strategic scale sites, the resulting headroom and, therefore, the resilience of the Plan overall, are realistic. The Housing Topic Paper (MS-TP2) provides a housing trajectory for sites that are considered to make up the Council's 5 year housing land supply (5YHLS) for the period 2025/26 to 2029/30. However, beyond this point the Council has provided very little information as to the assumptions and trajectories of the 3 strategic scale sites; paragraph 3.19 of the Housing Topic Paper gives an indication as

to when the sites are anticipated to be completed, but there is no detail as to the assumptions made regarding planning process lead-in time, delivery rates per year or how many housebuilders will be on site at any one time.

5. The latest housing trajectory we have identified for the Sayers Common allocations (DPSC3 to DPSC7) is in the Sayers Common Statement of Common Ground (SoCG), but this is a 2024 document and so is not up to date in that regard. No up to date trajectories are provided for the other 2 strategic allocations so we have no understanding of what the underlying assumptions are for these sites, other than general indication of the anticipated years the sites will be completed.
6. In the Housing Topic Paper, the Council has cited its strong record of delivering housing, referring to the current allocations in the adopted District Plan and the Site Allocations DPD, as an indication of robustness with the Submission Plan as to the anticipated delivery of housing. This record is commendable and not disputed, but it is nevertheless true to say that the scale of the individual developments being delivered, with the exception of DP9: North and North-west Burgess Hill (housing delivery is in the earliest phases with some commencement on site, and is anticipated to continue throughout the plan period), does not compare to that of the strategic allocations now proposed, nor the complexities of the location and infrastructure requirements of the DSCP3, with DSCP4 to DPSC7, at Sayers Common in particular.
7. The Council's past record of delivery does not negate the need for clarity as to the assumptions that have been made with regard to the delivery of the strategic sites in particular, and therefore whether the headroom is sufficient, in order that a judgement can be made as to the resilience of the Plan.

5 Year Housing Land Supply (5YHLS)

8. Paragraph 68 of the NPPF requires that plans should identify a supply of specific, deliverable sites for years 1 to 5 of the plan period. Whilst the Housing Topic Paper provides a 5YHLS at Appendix 4 for the 5 year period 2025/26 to 2029/30, this is considered to be one year short in its provision. On the assumption that the Plan is found sound, it will not be adopted until the 2026/27 reporting year. This will therefore be Year 1 of the plan period meaning that a 5YHLS needs to be identified up to 2030/31. Whilst we can assume from Table 20 in the Housing Topic Paper that the Council considers it can demonstrate the necessary 5YHLS to include 2030/31, the site's making up that supply have not been expressly identified, as is required by the NPPF.
9. Notwithstanding, the 5YHLS position stated is based on a stepped housing requirements and, as set out in our Hearing Statement to Matter 1, it is considered that the Council's housing requirement could and should be based on a consistent annual requirement and the necessary 5YHLS identified accordingly to meet this.
10. In addition, we have concerns as to the delivery assumptions for the smaller proposed allocations at Sayers Common (DPSC4 to DPSC7). The 5YHLS indicates that of the total 516 dwellings proposed for these 4 sites, 356 dwellings are anticipated to be delivered by 2029/30 (or assumed the full 516 dwellings if the full 5YHLS

period was outlined, as required, up to 2030/31). Whilst planning applications, or at least an EIA Screening Opinion request, have been submitted for all 4 these sites, the delivery assumptions for them coming forward in advance of the main strategic allocation at Sayers Common (DPSC3), are questioned. It has not been demonstrated whether this scale of growth – over 500 dwellings – is appropriate for what is a lower order, tier 3 settlement, far exceeding the levels of growth proposed at other settlements higher in the hierarchy, in advance of the services and facilities which are to be provided within the main strategic allocation. The robustness of the 5YHLS position is therefore questioned in this regard.

Rolling 5YHLS Position

11. The Council, at Table 20 of the Housing Topic Paper, has set out its anticipated rolling 5YHLS position. In reviewing whether this is a robust position for the Plan, we would outline the following points for consideration:

- It is based on a stepped housing requirement which is not considered to be justified (refer to our Hearing Statement to Matter 1).
- The Council has not provided the trajectories for the strategic allocations, together with the existing allocation DP9: North and North-west Burgess Hill, to justify the assumptions being made about housing delivery.
- There are clear pinch points where housing land supply becomes more marginal (2031/32 in particular), and the potential need for additional supply (allocation of additional sites) should be considered.

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