

Mid Sussex Local Plan 2014-2031
Site Allocations Development Plan Document Examination

Matter 7
Gladman Developments Ltd



May 2021

Matter 7 – Development Management, Uncertainties and Risks

Point 7.2: Uncertainties and Risks

- 1.1 Gladman considers that in its current form the Site Allocations DPD fails to take sufficient account of uncertainties and risks. As put forward in its representations to Matter 3, Gladman is concerned that the Council's proposed 'over-supply' of just 484 dwellings above the minimum requirement of 16,390 homes is too low and consider it would have been more appropriate to have planned for a greater contingency to provide a cushion against uncertainties and risks. Our Matter 3 hearing statement suggested this contingency should have been between 10% and 20%, which is a widely accepted buffer to ensure a Plan is sufficiently flexible and able to adapt to rapid change (Para 11a of the Framework).
- 1.2 Further compounding matters is the Council's over reliance on four strategic sites, which together account for 35.4% of the districts housing requirement. Of note is the reliance placed on site DP9 (North and North-West Burgess Hill), which it has been assumed will deliver 2,787 dwellings within the plan period up to 2031. The current trajectory envisages this site delivering between 260 and 300dpa from the year 2022/23. However, appended to our Matter 3 statement was Lichfield's 'Start to Finish' Report (Second Edition) ¹ which proposed that the average delivery rate on sites of over 2,000 dwellings was circa 160dpa.
- 1.3 Several factors can cause delay in the delivery of the large strategic sites including, for example, infrastructure which often takes longer to come forward than envisaged. Any notable delays on any of the Councils strategic sites will have knock-on implications in the Council's ability to demonstrate and maintain a five-year supply of deliverable housing sites.
- 1.4 In summary, Gladman believes that the lowcontingency and over reliance on strategic sites, exposes the Plan to a greater degree of uncertainty and risk. To remedy this, Gladman considers that the Plan should have sought to allocate further, non-strategic sites that could be delivered sooner to ensure a rolling 5-year housing land supply could be maintained throughout the Plan period.

¹ Lichfields Start to Finish (Second Edition) Report <https://lichfields.uk/media/5779/start-to-finish-what-factors-affect-the-build-out-rates-of-large-scale-housing-sites.pdf>