

Representations to Examination Hearing of Draft Mid Sussex District Plan 2021-2039

Matter 3 - Homes to Meet the Needs of All the Community

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1. INTRODUCTION

- 1.1. This document comprises Representations for, and on behalf of, Hurstpierpoint and Sayers Common Parish Council (the 'Parish Council'), to the Examination Hearing of the draft Mid Sussex District Plan 2021-2039.
- 1.2. These Representations have been prepared following the submission of Representations by the Parish Council in response to the statutory consultation on (i) the Consultation Draft (Regulation 18) Mid Sussex District Plan 2021 - 2039 (December 2022); the (ii) the Submission Draft (Regulation 19) Mid Sussex District Plan 2021 - 2039 (February 2024) (the 'Draft Plan'); and (iii) representations in response to, and attendance at, the Stage 1 Examination Hearings in October 2024.
- 1.3. These Representations relate to the 'Matters and Issues' (MI) outlined by the Inspector, and in particular MI3: Homes to meet the needs of all the community.
- 1.4. The Parish Council seek to rely on these Written Representations, and have not requested to attend and participate in the Hearings in relation to this Issue and Matter.

2. MATTER AND ISSUE 3: HOMES TO MEET THE NEEDS OF ALL THE COMMUNITY

- 2.1. The Inspector has identified that the key issue in respect of MI3 is 'whether the plan's policies will enable enough homes to come forward to meet the needs of all groups'.
- 2.2. Policy DPH7 of the Draft Plan sets out support for the delivery of sustainable mixed and balanced communities. It seeks the provision of a mix of dwelling types and sizes based on recommendations contained within the Strategic Housing Market Assessment 2021 (October 2021) prepared by Icen Projects (SHMA).
- 2.3. For market housing the recommended housing size mix is:
 - 1-bed/2 person - 5-10%;
 - 2-bed/4 person - 20-25%;
 - 3-bed/5 person - 40-45%; and
 - 4 + bed/6 person - 25-30%.
- 2.4. The reasoning for this is contained in the SHMA document.
- 2.5. Table 9.3 of the SHMA notes the existing number of bedrooms by tenure according to ONS data (2011), for owner-occupied properties in the district is:
 - 1-bed - 4%;
 - 2-beds - 20%;
 - 3-beds - 41%; and
 - 4 + beds - 35%.

- 2.6. Table 9.4 of the SHMA summarises the projected change in household by age. It details that the greatest predicted change between 2021 and 2038 is an increase in older persons, aged over 65 and a particular increase in those aged 80 and over.
- 2.7. In setting out the recommendation for housing size mix, the SHMA states that *“based on the evidence, it is expected that the focus of new market housing provision will be on 2 and 3-bed properties. Continued demand for family housing can be expected from newly forming households. There may also be some demand for medium sized properties (2 and 3-beds) from older households downsizing and looking to release equity in existing homes, but still retaining flexibility for friends and family to come and stay.”*
- 2.8. Since the preparation of the Draft Plan Icen Projects were commissioned by MSDC to produce a Mid Sussex Strategic Housing Market Assessment Update (October 2024) (SHMAA). This was prepared in part to reflect 2021 Census data, that had become available since the preparation of the SHMA, and to extend projections over the Plan period to 2040.
- 2.9. The SHMAA notes that population change 2021 to 2040 (in 5-year age bands) is most significant, in the age ranges 75-79 (44.5%); 80-84 (68.3%); and 85+ (80.1%)¹. When applied to broad age ranges, this shows a significant predicted change from 2021 to 2040 in Mid Sussex for the over 65's of 47.1%, in comparison to the 16-64 age range of 19.5%². The SHMAA notes that the population growth of persons aged 65 and over is expected to account for 39% of the total projected population change in the district over the plan period.
- 2.10. In applying the updated demographic data, the SHMAA notes that the projected household growth by the age of the household reference person (head of household) is particular strong in older age groups (as well as some younger age groups below the age of 35).
- 2.11. Based on this, the SHMAA sets out a modelled mix of housing need by size and tenure (market/ affordable home ownership/ affordable housing rented) for the district. This indicates that market housing need focusses on 3+ bedroom homes, affordable home ownership on 2-bedroom accommodation and rented affordable housing on a slightly smaller profile.
- 2.12. In comparison to the SHMA, the SHMAA considers there is a slightly greater potential need for 4+ market housing and a greater need for 2-bedroom rented affordable housing (at the expense of 1-bedroom homes).
- 2.13. As a result of this, the SHMAA recommends a revised housing mix by size for market housing of:
- 1-bed/2 person - 0-10%;
 - 2-bed/4 person - 20-25%;
 - 3-bed/5 person - 40-45%; and
 - 4 + bed/6 person - 30-35%.³

¹ Table 2.3 of the SHMAA

² Table 2.4 of the SHMAA

³ Table 5.5 of the SHMAA

- 2.14. The SHMAA emphasises that its findings in relation to demographic change, and the subsequent recommendations in respect of recommended market housing mix are significantly informed by new 2021 Census data.
- 2.15. This 2021 Census data, published online by the ONS indicates that the existing housing stock in Mid Sussex District is already comprised of a much greater proportion of 4+ bedroom homes (30.4% of all homes) than compared to rest of England (21.1% of all homes).
- 2.16. This ONS data, based on the 2021 Census, also indicates whether accommodation is likely to be over or under occupied. Where data is recorded as +1 then it implies that a households accommodation has more bedrooms than required (and -1 indicates less bedrooms than required). The data shows that the existing housing stock in Mid Sussex is significantly 'under occupied' (43.7% +2 and 31.4% +1) compared to the rest of England (35.6% +2 and 33.2% +1)⁴.
- 2.17. The 2021 Census data therefore indicates that the conclusions of the SHMA and SHMAA are likely to be under-representing the need and demand for smaller properties. The very high level of +2 under occupation in the district compared to the England average indicates there is likely to be a demand for smaller properties that is not being met by the existing supply of new homes.
- 2.18. Reflecting this data, the Parish Council notes that planning permission was sought in 2020 for the change in mix of an approved residential development in Sayers Common. This proposed a change to the development mix to increase the number of 3-bed properties and decrease the number of 4 and 5-bed properties (LPA reference DM/20/2937).
- 2.19. This evidence reflects the anecdotal experience of the Parish Council, that there is a demand for smaller properties as a result of downsizing by older persons, but this is hampered by a lack of supply. This is an issue acknowledged within the SHMA.
- 2.20. On this basis, it is considered that the proposed housing size mix in Policy DPH7 for market housing does not reflect the existing and future demand trend. The policy is therefore considered to be unsound.
- 2.21. It is considered that to reflect demand, the balance in housing size mix should include a requirement for a greater proportion of smaller homes in new developments.
- 2.22. It is considered that the market housing size mix in Policy DPH7 for new residential properties should be:
- 1-bed/2 person - 5-10%;
 - 2-bed/4 person - 35-40%;
 - 3-bed/5 person - 40-45%; and
 - 4 + bed/6 person - 10-15%.
- 2.23. This change would result in a policy that is justified against the Evidence Base, in particular the 2021 Census data, and would be consistent with national policy.

⁴ <https://www.ons.gov.uk/census/maps/choropleth/housing/occupancy-rating-for-bedrooms/occupancy-rating-bedrooms-6a/occupancy-rating-of-bedrooms-plus-2-or-more?lad=E07000228>