

Mid Sussex District Plan Examination

Hearing Statement – Matter 1: The Housing Requirement

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

(Response ID: 1189677)

February 2026

1. The Housing Requirement

Whether the plan's housing requirement makes sufficient provision for new homes.

d) Whether a stepped requirement is appropriate

1. The Council states that its housing requirement is 20,674 dwellings, equating to 1,088 dwellings per annum (dpa), for the plan period 2021 to 2040, and that this will be provided over a stepped trajectory as follows:
 - 2021/22 to 2030/31 – 900dpa
 - 2031/32 to 2039/40 – 1,187dpa
2. In the Housing Topic Paper published in January 2026 (MS-TP2), at paragraphs 4.3 to 4.5, the Council sets out its justification for introducing a stepped housing trajectory, something which had not previously been considered necessary at the time of Submission of the Plan; the Submission Plan had been planning for a requirement of 1,090dph (updated to 1,039dph as at 1st April 2024) across the entire plan period. The Council's justification for now including a stepped trajectory is, to paraphrase:
 - Delayed Local Plan adoption reducing the amount of committed development;
 - Reliance on strategic allocations; and
 - Crawley Land Supply falling from 2032/33 onwards.
3. Planning Practice Guidance ("PPG") confirms that stepped trajectories may be appropriate where there is a significant change in the level of housing requirement between adopted and emerging policies and/or where strategic sites will have a phased delivery or delivery later in the plan period. However, importantly, PPG notes that local authorities must not seek to unnecessarily delay meeting identified development needs. (Paragraph ID: 68-021-20190722) (our emphasis)

Significant change in housing requirement

4. With regard to the first of justifications in the PPG, it is evident that this does not apply in this case. The adopted Local Plan (2014-2031) which did have a stepped housing requirement, has a housing requirement 1,090 dpa for the period after 2024 – the requirement of the Submission Plan – and the standard method figure pre December 2024 (accepting the age of the adopted Local Plan) was 1,039 dpa. This is in comparison to the 1,088 dpa requirement now being proposed.
5. It is clear that there is very little, if any, difference across the range of requirement figures proposed, let alone the 'significant change' set out in PPG. As such, the stepped requirement proposed does not meet this justification requirement of PPG.

Phased Delivery of Strategic Sites

6. The Council are proposing a series of strategic scale sites; however, this approach is not a recent update to the Submission Plan, rather this has been a significant part of the housing delivery provided for in the Local Plan Review from the outset. The same 3 strategic locations, comprising a total of 7 land parcel allocations, were included in the Submission Plan, as is referenced in the Housing Topic Paper, the only difference being that the anticipated supply from these sites has actually increased by from 5,243 dwellings to 5,816 dwellings. Clearly, therefore, it is the delivery timing of these sites and what has now become apparent as an over-reliance on strategic site delivery that is proving to be the underlying necessity of the stepped trajectory; the delivery of DPSC2: Crabbet Park and DPSC3: Sayers Common, being the main two allocations of concern.
7. The Council, at paragraph 4.5 of the Housing Topic Paper, indicates that the one year delay in the adoption of the Local Plan Review has prevented the ‘top-up’ of committed development supply. However, this does not explain why a reduction in supply for years 1 to 5 of the Plan is now necessary, if the delivery of the strategic sites had been realistic from the outset.
8. Whilst the Council’s delivery record of sites within the adopted Local Plan and the Sites Allocations DPD is good and reflected in the Housing Delivery Test measurements over recent years, only one of these allocations (North and North West of Burgess Hill) is reflective of the scale currently now proposed, or the isolated rural location of DPSC3, in particular.

Allocation of additional non-Strategic scale sites

9. As such, rather than seeking to provide for stepped housing requirement, instead the Council should boost the supply from non-strategic scale development sites which can deliver in the first 5 years and years 6-10 of the Plan period. As has been indicated in our previous Regulation 19 stage representations, there are considered to be a number of deliverable Sites in sustainable locations which can boost housing land supply in years 1-5 of the Plan period.

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