



Mid Sussex District Plan 2021 -2040
Examination

**Matter 2: Housing Supply and Headroom
Hearing Statement**

February 2026



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MATTER 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

- A.1.1 Table 5 of the Housing Topic Paper (MS-TP2) sets out the current status for each of the draft allocations (DPSC1 – DPSC7 and DPA1 – DPA17). Importantly, the table demonstrates that none of the three Significant Sites (DPSC1, DPSC2 and DPSC3) have had a planning application submitted to date.
- A.1.2 The Housing Trajectory (1st April 2025) provides the expected delivery rates for the three Significant Sites, which are all expected to start delivering in year 6 (2030/31). There is limited further evidence before the examination to prove that these delivery rates are realistic, particularly with regards to DPSC3, which is expected to begin delivering 200dpa from it's first year of delivery, and continue at this pace through to the last year of the plan period (2040).
- A.1.3 Considering the District Plan Review's substantial reliance on just three sites, the Council need to provide robust evidence and justification for the trajectory. The Lichfield Start to Finish (third edition)¹ indicates that the average planning approval period for large sites of 1,500-1,999 and 2,000+ is 5 years and 5.1 years respectively. In the context of none of the three strategic sites having a planning application submitted at the time of the examination, and limited evidence provided regarding

¹ Lichfields Start to Finish. How quickly do large-scale housing sites deliver? Third edition. <https://lichfields.uk/media/w3wjmw0/start-to-finish-3-how-quickly-do-large-scale-housing-sites-deliver.pdf>

the expected timing of an application submission, there has to be doubt over the anticipated start date for the three sites of 'Year 6'.

- A.1.4** Further to this, the Lichfields Start to Finish Report (third edition) provides average build out rates, which range from 68dpa-101dpa for site sizes 1,000-1,499, 74dpa – 130dpa for site sizes 1,500-1,999 and 100dpa-188dpa for site sizes 2,000+. Each of the three Significant Sites are expected to deliver above the upper average range for site delivery for the respective site size in every year, except the first year of DPSC2. Indeed, with regards to DPSC1, in every year the delivery is expected to be above the upper average, and in three of the years, the delivery is expected to be significantly over the maximum data point from the study (172dpa).
- A.1.5** This goes to the point of whether the District Plan Review provides sufficient supply over the plan period as delays in site commencement, as well as lower than expected completions would result in the District Plan Review failing to deliver a sufficient supply over the plan period to 2040. It is therefore not sound as it would not be effective in delivering the minimum housing requirement.

B) The amount of potential supply headroom over and above the housing requirement

- B.1.1** The Housing Topic Paper sets out that only a 5% headroom will be applied to submission draft allocations not subject to planning consent, which total 2,798 dwellings, of which 1,350 (almost half) are from one site, DPSC1. MSDC state that there is sufficient time in the trajectory for delivery delay to be made up, however in the instance of MSDC1, which is expected to complete in year 13, this only leaves two years to make up for any under delivery, which could result from delay to starting delivery, or from delivery rates lower than those expected in the trajectory (noting the previous comments in response to point (A) regarding delivery rates).
- B.1.2** In relation to DPSC2 and DPSC3, the Council have allowed for one year 'slippage' in delivery, which equates to 375 dwellings (less than 10% of the expected yield from these two sites). Looking at headroom allowance for the three Significant Sites combined, the Council have only allowed for a slippage rate of 8.3%, which considering the reliance on these three sites, fails to allow for sufficient headroom.

- B.1.3** The Housing Topic Paper provides a detailed, and rather convoluted methodology and justification for only applying an overall 'buffer' or headroom of 567 dwellings over the plan period to 2040 (which equates to just 2.5% of the overall housing supply set out in Table 8 of the Housing Topic Paper).
- B.1.4** It is noted that if the District Plan Review were to provide a more significant, and robust headroom to their supply, without identifying any further sources of supply, it would reduce the Unmet Need Contribution, which has been calculated by subtracting the LHN figure (18,981 dwellings) and the headroom allowance (567 dwellings) from the overall supply (21,241 dwellings) to provide a contribution of 1,693 dwellings. Notwithstanding Gladman's position on the approach to including unmet need from neighbouring authorities within the housing requirement in order to satisfy the transitional arrangements not being legally sound, a reduction in the Unmet Need Contribution due to providing for an increase in the headroom, would result in the District Plan Review's housing requirement being below 80% of the December 2024 NPPF LHN figure, and therefore failing to be consistent with the provisions of paragraph 234(a) and the transitional arrangements. Consequently, the plan should not be examined under the previous December 2023 version of the Framework.