



THAKEHAM

District Plan Examination

Mid Sussex District Plan 2021-2039

**Hearings Statement relating to: Matter 5 – The Spatial
Strategy**

Submitted by Thakeham Homes

Matter 5: The spatial strategy

The effectiveness and soundness of the proposed distribution of new development in meeting social, economic and environmental objectives, whether it will achieve more than the sum of its parts and whether it will amount to positive planning.

Issue a) Whether the plan's apportionment of development to larger and smaller settlements and freestanding allocations, and to different sizes of site, is effective in ensuring delivery and in meeting community needs

5.1. The approach of the emerging Local Plan is broadly effective, in respect of the present spread of proposed development. However, as highlighted under Matters 1-3, there is a need to allocate more sites for development, which would be justified, effective and positively prepared. There is scope therefore, to amend and enhance the spatial strategy presently proposed to ensure a sound plan, in response to meeting housing needs and unmet needs.

Diversity of Site Sizes

5.2. Ensuring a balanced mix of site sizes is essential to maintaining a reliable, deliverable housing pipeline throughout the plan period. Small, medium, and large sites each build out at different rates, with larger strategic schemes typically progressing more slowly due to their greater complexity and associated delivery challenges. By allocating a diverse portfolio of sites, the Local Plan becomes more resilient to fluctuations in the wider economy and housing market, reducing the risk of stalled delivery and helping to maintain a consistent housing supply over time. This would be consistent with NPPF (2023) paragraph 70.

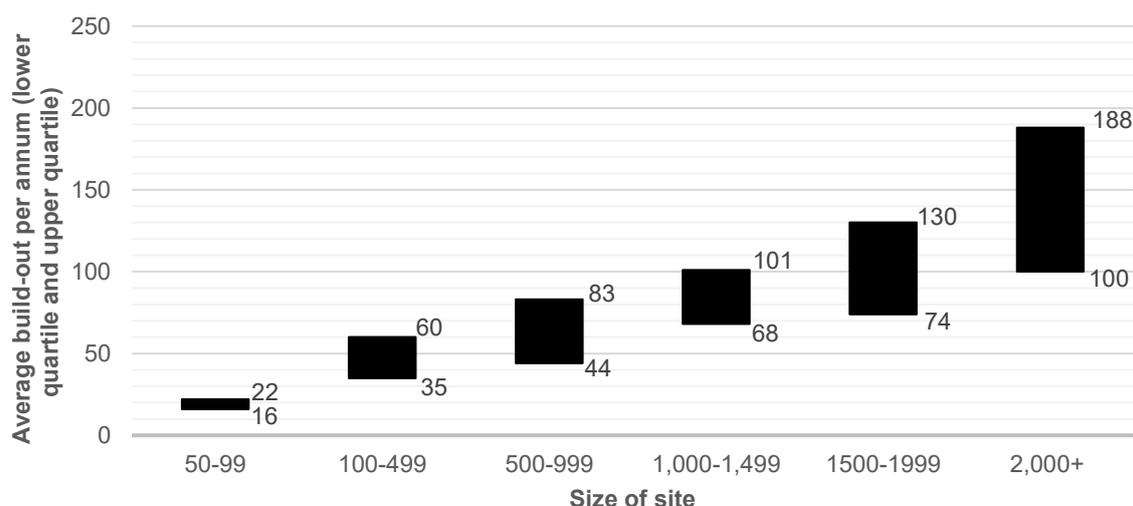
5.3. Document MS-TP2 (Housing) lists out the most up-to-date draft allocations for the emerging Local Plan. Of the total yield of housing supply allocations (as proposed based on a lower than justified overall housing requirement), 73% is scheduled to be delivered from three Sustainable Communities allocations DPSC1, DPSC2, and DPSC3¹. Whilst Thakeham does not object to the allocations per se (and indeed is promoting one of them) – owing to the lower than justified housing requirement - this represents a significant proportion of the total site allocations. At this moment in time, none of these three allocations have submitted a planning application, and MS-TP2 suggests that these three sites are anticipated to be delivered from year 6 onwards and finish between year 13 and 15. This, therefore, gives these sites a delivery timeframe of 8-10 years. Thakeham would broadly support that assumption in respect of West of Burgess Hill, DPSC1.

5.4. However, when comparing Mid Sussex's estimated build-out rates to a study conducted by Lichfields². It is clear that Mid Sussex is potentially being overly optimistic, and that the build-out rates of these 3 sites are likely to exceed MSDC's projections.

5.5. Graph 1 below shows the average build-out rate by size of the site, data taken from Lichfields' analysis on 297 sites across the country. This demonstrates that smaller sites may come forward more quickly, indicating that a good range of site scale is more likely to maintain a rolling five-year housing land supply.

¹ $\frac{1350 (DPSC1 Revised Yield) + 1,950 (DPSC2 Revised Yield) + 2,000 (DPSC3 Revised Yield)}{7262 (Total Supply from Allocations)} \times 100 = 72.98\%$

² <https://lichfields.uk/media/w3wjmw0/start-to-finish-3-how-quickly-do-large-scale-housing-sites-deliver.pdf>



Graph 1: Average build-out per annum based on size of site (Data taken from Lichfields Analysis)

Table 1 below compares these realistic build out rates to the proposed build out rates by Mid Sussex.

MSDC data (MS-TP2: Housing)				Lichfields Analysis data	
Site Allocation	Proposed Delivery timeframe	Number of dwellings	Average dwellings per annum required	Average build out rates based on size of site (Lichfields Data)	Realistic Delivery Timeframes based on average build out rates (Lichfields Data)
DPSC1	8 years	1350	168.75 dpa	88-101 dpa	10 years +
DPSC2	10 years	1950	195 dpa	74-130 dpa	15 years +
DPSC3	10 years	2000	200 dpa	100-188 dpa	15 years +

Table 1: Proposed vs. realistic delivery timeframes for DPSC1, DPSC2 and DPSC3. Data taken from MS-TP2: Housing and Lichfields Analysis

- 5.6. Based on the average build-out rates identified by Lichfields, the expected delivery timeframes for DPSC1, DPSC2 and DPSC3 are likely to be greater those assumed by MSDC – though account should be had of local track record in coming to a qualitative conclusion, noting for example, that Thakeham Homes at Woodgate (*DC10 – East of Pease Pottage*) have delivered the entire site well within 10 years. It should be noted that key contributory factors for Pease Pottage being delivered at an above-average rate was the combination of Thakeham’s status as a local housebuilder, location at Crawley, the temporary Stamp Duty holiday introduced by the Government and favourable market conditions. The current market does not have such favourable factors, and current build/delivery rates are likely to be slower as a result, though these should improve.
- 5.7. The salient point is that the larger sites will contribute positively to medium/long-term supply, though as the emerging Local Plan is 73% reliant on them, a range of smaller to medium sites will be required to ensure a more robust and effective plan (notably sites of 50 – 500 dwellings).
- 5.8. Thakeham do acknowledge that 375 dwellings have been added to the headroom to accommodate for the potential delayed delivery. However, this is not sufficient when taking into account the realistic timeframes for the build-out rates of DPSC1, DPSC2 and DPSC3. In

particular, on the 12th of February, 2026, MSDC published its 1st April 2025 Housing Trajectory, and the delivery timeframe for DPSC1 has now been reduced to 7 years from the previous 8. Therefore, Thakeham considers the seven-year delivery timeframe for DPSC1 to be ambitious. Thakeham's Matter 1-3 Statements argue for a buffer over the housing requirement to improve the resilience of the emerging Local Plan. There is therefore a need for Mid Sussex to not only seek further site allocations, but also seek more small-to-medium sites to diversify their housing delivery allocations. This is to ensure that the proposed annual delivery is achievable and robust against potential wider market or site specific challenges.

Spatial Strategy

- 5.9. Mid Sussex is characterised by three principal settlements: East Grinstead, Haywards Heath and Burgess Hill, and a number of second order settlements. Also relevant is that the southern parts of the District are effectively part of the Sussex Coast Housing Market Area (separated only by the South Downs) and other, more northern parts that are firmly within the Gatwick Diamond and at the edge of Crawley (NWS HMA).
- 5.10. The most sustainable and deliverable spatial strategy would balance growth throughout the locations within the Gatwick Diamond / Sussex Coast market areas, which means edge of Crawley, and the settlements to the southernmost part of the District.
- 5.11. As already evidenced, Mid Sussex will need to seek a greater number of allocations of small to medium sites for their plan period to ensure consistent and achievable delivery. In the Hearing Statement submitted by Thakeham for Matter 1, Thakeham evidenced that Mid Sussex will need to seek a greater contribution to unmet need in neighbouring authorities, most importantly the unmet need of Brighton and Hove City Council and Crawley Borough Council.
- 5.12. When contributing to unmet need, MSDC should ensure that the spatial strategy accords with the proximity to the neighbouring council with an identified unmet need. The geography of the District demonstrates that there are a high concentration of proposed allocations and omission sites in multiple strategic locations that are close to Crawley and the Sussex coast, some of which have not been subject to any site allocations, most notably Thakeham's omission sites at Pease Pottage and Hurstpierpoint.
- 5.13. Pease Pottage represents an ideal strategic location to further contribute to Crawley's unmet need. Pease Pottage is defined by Policy DP6 as a Category 3 settlement within the district and is located on the southern border of Crawley Borough Council. Policy DP6 states that Category 3 settlements provide "*essential services for the needs of their own residents and immediate surrounding communities.*" Based on the settlement category's description, Pease Pottage's provision of facilities could accommodate additional homes.
- 5.14. Thakeham's Hurstpierpoint site is also considered to be in a sustainable location, within reasonable walking distance of Hassocks station (approximately 1.5km), and would contribute to the evident housing need for the East Sussex and Brighton Housing Market Area. It falls within Category 2: 'Larger Villages' in the council's settlement hierarchy and is circa 600m from the identified settlement boundary of Hassocks (also a Category 2 settlement). It is therefore considered to be one of the most sustainable locations in the district outside of the main towns, with the combined services and amenities of both Hassocks and Hurstpierpoint within easy reach. Growth in these locations is therefore imperative to ensure a maintenance of the vibrancy of these areas and to ensure wider housing delivery needs of the borough. Hurstpierpoint therefore has the capacity for more dwellings than the 90 that have already been allocated. The location within reasonable walking distance to Hassocks station will warrant future consideration, at the Development Management stage, under draft NPPF (2025) policy S5.
- 5.15. In seeking to increase the housing supply to meet both the Council's own need as well as the unmet need of neighbouring authorities, Mid Sussex should focus more on proactively seeking site allocations within the settlements that form part of the HMA catchments of neighbouring authorities with unmet housing need, namely Crawley and Brighton and Hove – this would be an effective response. A revision to the spatial strategy should seek to increase the site

allocations within or near the key settlements, like Pease Pottage and Hurstpierpoint. As outlined, emerging national policy has also identified that sites in close proximity to stations should be considered more favourably, both in regard to allocation in local plans and in the decision-making process. The allocation of Thakeham's Hurstpierpoint site would be in accordance with this strategy and assist in future-proofing the plan.

Issue b) The relationship between the spatial strategy and transport objectives, transport infrastructure and transport constraints

- 5.16. Thakeham has no particular comments to raise regarding the relationship between the spatial strategy and transport objectives. Broadly speaking, locating development in or adjacent to the larger settlements would act as a more sustainable solution to housing delivery supportive of Active Travel, and which provides economic / socio economic benefits.

Issue c) Whether the spatial strategy takes an appropriate approach, at the strategic level, towards climate change mitigation, countryside protection, environmental protection, flood risk and heritage

- 5.17. Almost 50% of Mid Sussex's administrative area lies within the High Weald National Landscape. A National Landscape is of significant value, and national policy requires that its social and environmental values are conserved and enhanced where possible. Objectives which may also be supported by any extensive Green Infrastructure enhancements associated with new development.
- 5.18. At the same time, the Council must balance these environmental and social responsibilities with its statutory obligation to plan positively for housing delivery across the borough.
- 5.19. The geography and economic importance of MSDC, requires a balanced approach to the treatment of the National Landscape. A sound outcome, is for development to be best planned, in the most appropriate and sustainable locations. There may be a number of sound planning reasons to allocate further development in the National Landscape, noting that the NPPF test of exceptional circumstances is a development management rather than planning policy test. The extent of the National Landscape means it is likely to be inevitable, that some proportion of the spatial strategy needs to be located within it, notably around key settlements such as Crawley and East Grinstead. Positively worded policies may be used to ensure well-designed, landscape-led development, were it allocated within the National Landscape. This exact process has played out at Woodgate (*DP10 – East of Pease Pottage*) as allocated in the last MSDC Local Plan.
- 5.20. Given the clear evidence that additional site allocations are required to meet the borough's housing need over the plan period, the Council must carefully assess where development within the National Landscape may be justified when weighed against the scale of unmet need. It is evident that a greater number of site allocations will be required across the borough, and in some cases, this may necessitate sensitively planned development within the National Landscape where the benefits demonstrably outweigh the associated landscape impacts.

END

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