



THAKEHAM

District Plan Examination

# **Mid Sussex District Plan 2021-2039**

**Hearings Statement relating to: Matter 2 – Housing Supply  
and Headroom**

Submitted by Thakeham Homes

## 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.**

### ***Issue a) Anticipated housing supply over the plan period***

- 2.1. The proposed housing supply over the plan period is ineffective in its current guise. An insufficient quantum of housing is proposed, and this needs to be increased in order to make the plan sound. As identified in the Housing Topic Paper (TP-02), the identified level of housing required through utilising the Standard Method in preparing the plan for submission was 1,090dpa. As the plan was submitted on 8 July 2024, and the evidence on housing numbers is specifically identified as being considered appropriate for a period of two-years in the PPG, then this figure remains the correct figure to utilise. As set out our response to Matter 1, whether or not to adjust the calculated housing figure is a matter of planning judgement, as there is no absolute obligation to do so (i.e. 'must') set out in the PPG. However, in the context that the figure of 999dpa proposed by MSDC is less than 80% of newest local housing need (1,356dpa), there is every reason to use the figure of 1,090dpa which has been utilised from the outset.
- 2.2. As can be seen from the data provided by MSDC in table 19 of TP-02, the housing supply in years 1-5 of the plan is identified as 5,632 dwellings (the latest Trajectory, document H8 published on 12th February indicates it as 5,330). Only through applying the figure of 999dpa are MSDC able to demonstrate a five-year housing land supply. If the figure of 1,090 is adhered to, MSDC will not have a five-year housing land supply in place.
- 2.3. It should be noted that the figure of 1,090dpa is the figure calculated at the point of plan submission, that does not make any specific allowance for unmet need from other Local Authorities (such as Crawley). As identified in our response to Matter 1, in the adopted District Plan MSDC provided 1,500 homes as a contribution to meet unmet need. Given the increased unmet need in Crawley (in comparison to their previous Local Plan), in order for MSDC to deliver a reasonable proportion there will need to be a larger contribution by MSDC. This will need to be appropriately factored into the housing supply over the period.
- 2.4. At present, the emerging Local Plan is ineffective and contrary to national policy, as there will be no five-year housing land supply on adoption.

### ***Issue b) The amount of potential supply headroom over and above the housing requirement***

- 2.5. In line with the Inspector's comments in Annex 3 of document idjb-01, inclusion of a suitable level of headroom is not a stipulated requirement but is a key consideration in any plan. For a plan to be suitably sound and robust, Thakeham's position is that a 10% buffer should be applied to provide suitable headroom and allow for delays in delivery / unforeseen circumstances arising.
- 2.6. The currently identified headroom, as identified in table 13 of TP-02, is 567 dwellings. This is clearly insufficient. Even with the housing requirement set out in table 14 of TP-02 that is calculated on the basis of an annual need of 999dpa across the intended plan period, a requirement of 20,674 is identified. A 10% headroom buffer for resilience would require the headroom to be circa 2,067 dwellings. The proposed buffer of 567 dwellings is approximately 2.75%.
- 2.7. Notwithstanding that this housing requirement is, in Thakeham's view, artificially low (as it should be utilising 1,090dpa not 999dpa) and needs to appropriately consider unmet need, the proposed headroom buffer should clearly be in the region of 2,000+ dwellings in order to deliver

suitable headroom and resilience over the plan period. When unmet need is appropriately factored in, this requirement will rise further.

***Issue c) The supply trajectory over the plan period***

- 2.8. The supply trajectory over the plan period is felt to be a matter for the Council to primarily address, but it should be noted that in progressing with a stepped trajectory in the previous plan has resulted in MSDC being unable to demonstrate a five-year housing land supply when the trajectory stepped up as scheduled.
- 2.9. Thakeham is supportive of a stepped trajectory being utilised if it can be demonstrated that this is an appropriate and suitable route to take, once a good mix of additional sites have been allocated. Based upon recent experience it is questionable whether this approach would be the most effective way in which to support housing delivery in the District over the plan period.

***Issue d) The potential for lower than anticipated supply arising from delivery impediments, longer lead in times and slower build out rates***

- 2.10. MSDC have set out in TP-02 that they have historically had a strong delivery rate on consented sites. Thakeham can attest that site DP10: *East of Pease Pottage* (which was built-out by Thakeham), consented in 2015 has now been completed, which further reinforces that delivery on consented sites has historically been in line with expectations – notably in those areas of need (i.e. near Crawley).
- 2.11. However, whilst appropriate rates of delivery can be readily evidenced for existing District Plan and Site Allocations DPD allocations, past performance on delivery rates does not predicate future success. Particularly when the new sites allocated will be different from those previously allocated, and therefore have different challenges to overcome. It should be noted that key contributory factors for Pease Pottage being delivered at a high rate was the combination of Thakeham's position as a locally based housebuilder, location at Crawley, the Stamp Duty holiday and favourable market conditions. The current market does not have such favourable factors, and current build / delivery rates are slower as a result – though should change in time.
- 2.12. The most straightforward approach to mitigate instances of lower than anticipated supply is through allocating a greater number of sites, and ensuring a variety of site sizes and locations are included, in order to provide robustness for any delivery challenges that arise.

***Issue e) The resilience of the plan against such contingencies***

- 2.13. As with Issue d), Thakeham is minded that the most appropriate approach to ensure resilience in the plan is to allocate a greater number of sites than are currently proposed to deliver a higher housing number that provides a more appropriate buffer. In doing so, MSDC should ensure a variety of site sizes and locations are included, in order to provide robustness for any delivery challenges that arise. At present, the emerging Local Plan is ineffective as there is no five-year housing supply on adoption.

***Issue f) The 5 year housing land supply position at adoption***

- 2.14. As addressed under issue a) of Matter 2, it can be seen from the data provided by MSDC in table 19 of TP-02, the housing supply in years 1-5 of the plan is identified as 5,632 dwellings (5,330 dwellings in the more recent trajectory). Only through applying the figure of 999dpa are MSDC able to demonstrate a five-year housing land supply.
- 2.15. If the figure of 1,090dpa is adhered to, MSDC will not be able to demonstrate a five year housing land supply at the point of submission (1,090 x 5 (= 5,450) + 5% buffer (272.5), giving a figure of 5,722.5 dwellings required over a five year period). TP-02 identifies in table 19 that MSDC's supply in years 1-5 will be 5,632 dwellings (lower still in the 12<sup>th</sup> February trajectory – 5,330). As a result, there will be an undersupply of either 91 or 392 units, and a five year supply position of 4.92 - 4.65 years, with no flexibility for any matters arising that cause a delay in delivery.
- 2.16. The emerging Local Plan is therefore ineffective and not be positively prepared.

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***Issue g) The ability to maintain a rolling 5 year housing land supply***

- 2.17. A trajectory graph is provided in TP-02; however, on 12th February 2026, the MSDC published an updated trajectory (document reference H8) in the Council's evidence. Thakeham considers that specific comments on the updated trajectory should be submitted with supporting evidence at the Hearing itself.
- 2.18. MSDC has shown in TP-02 that when they have engineered a new housing need position of 999dpa, they can demonstrate a five-year housing land supply. However, this is not the correct figure to be utilising. As stated above, it is the 1,090 figure produced and valid at the time of submission. This will leave MSDC without a five year supply from the outset.
- 2.19. In order to maintain a rolling 5 year housing land supply, MSDC need to allocate a range of sites that address a range of types (brownfield/greenfield) and sizes from large strategic (1,000+ units) through to minor (4-9 units). Only through suitable diversity of site sizes, types, and locations will the ability for sites to consistently come forward be ensured.
- 2.20. Thakeham has control of an array of sites in the District that could be included in the plan and assist in providing site size, type and locational diversity, aside from the Strategic site allocation DPSC1. This includes sites at East Grinstead (capable of delivering circa 400 units), Pease Pottage (circa 600 units), and Hurstpierpoint (60-80 units). All are deliverable in the near future.

END

**Word Count: 1,587**