



THAKEHAM

District Plan Examination

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

**Hearings Statement relating to: Matter 1 – The Housing  
Requirement**

Submitted by Thakeham Homes

## Matter 1: The Housing Requirement

*These Hearing Statements are submitted by Thakeham Homes to the Inspector in regards to the Mid Sussex District Plan 2021-2039 Examination. They provide Thakeham's position on Matters one to seven provided by the Inspector and the Issues within. It expands on the points raised in the Regulation 19 representations, responding directly to the Inspector's questions and building upon the release of new evidence provided by Mid Sussex District Council.*

*Thakeham have submitted 5 sites, together totalling c.2,775 proposed dwellings, to the Call for Sites of the emerging Local Plan. One of the submitted sites includes the land West of Burgess Hill, which has been allocated by the Council for c.1,350 dwellings.*

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

- 1.1. Thakeham understands that NPPF (2024) paragraph 234 b) applies in the case of the emerging Local Plan. This is because the Local Plan was submitted prior to 12 March 2025 (in July 2024). This does not explicitly require the Local Plan to have been produced based on at least 80% of up-to-date Local Housing Needs and allows the use of the former measure of Local Housing Needs under the Standard Method (applicable at the time of the submission). This means the Examination may proceed under NPPF (2023). It is a matter of planning judgement how the relevant calculation of housing needs is interpreted in the approaching two years since submission, in light of the PPG.

#### **Issue a) Local housing need**

- 1.2. As per the Inspector's letter of 17 December 2025, MSDC were invited to provide an update to the Inspector with a Local Housing Need Figure derived from the current Standard Method. Paper MS-TP2: Housing has been produced by MSDC to address the Inspector's request. The approach outlined by MSDC is unjustified.
- 1.3. The paper initially sets out what the housing need would be if they were to apply the 2023 approach to calculating the Local Housing Need and update it for the most recently available (2025) affordability information. This is not what has been requested. Only in paragraph 1.8 do the Council address the question asked of it, where a figure of 1,358dpa is calculated using the latest housing method, and it is set out that 80% of that would be 1,087dpa. This is 3dpa less than the requirement identified when the plan was initially submitted for examination.
- 1.4. The Council have not been asked to apply the previous Standard Method to updated figures, or an 80% figure. The approach to identifying housing need through the Standard Method has been amended by the Government in 2024 to provide a more suitable direction for identifying housing need. Applying an approach (that has been moved on from) to data available after that approach had been rejected is not required and has not been requested. As the Plan was submitted for examination on 8 July 2024, there is no need to update the calculated housing need as set out in the PPG, as this is fixed for two-years.

#### When should strategic policy-making authorities assess their housing need figure for policy-making purposes?

*Strategic policy-making authorities will need to calculate their local housing need figure at the start of the plan-making process. This number should be kept under review and revised where appropriate.*

*The housing need figure generated using the Standard Method may change as the inputs are variable and this should be taken into consideration by strategic policy-making authorities.*

“However, local housing need calculated using the standard method may be relied upon for plan making for a period of two-years from the time that the plan is submitted to the Planning Inspectorate for examination”.

Paragraph: 008 Reference ID: 2a-008-20241212

- 1.5. The underlined section of the PPG has been left out of paragraph 1.4 in paper TP-02, but is part of the full PPG section. It clarifies that whilst the housing figure may change, the figure at the point of submission can be relied upon for a period of two-years.
- 1.6. In line with the PPG, and as per the full section of the PPG, the housing figure generated using the Standard Method applied when calculating the need for the Plan can be relied upon without question for a period of two-years since submission. As stated on MSDC’s website, a formal submission to the Planning Inspectorate was made on Monday, 8 July 2024. Consequently, the housing need calculated at the time of submission can be relied upon until 7 July 2026. There is no requirement to amend the figure, or seek to have it reduced through applying a calculation that has been determined to no longer be the most appropriate method (and has been rejected for a new method of housing need calculation).
- 1.7. It is acknowledged that the PPG guidance on plan making states that the housing number calculated should be revised “where appropriate”, that the housing figure may change as the inputs are variable, and that this should be taken into consideration. It is Thakeham’s position that - notwithstanding whether PPG guidance published in 2024 in relation to an updated NPPF should be relied upon when examining a plan prepared under the 2023 NPPF - the guidance does not require the figures to be recalculated, and it is not appropriate to do so in this instance.
- 1.8. 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 guidance. However, in the context that the figure of 999dpa proposed by MSDC is less than 80% of the newest local housing need (1,356dpa), there is every reason to use the figure of 1,090dpa, which has been utilised from the outset.
- 1.9. Applying judgment in these circumstances, Thakeham’s position is that the approach of trying to demonstrate through the paper that there is now only a requirement for 999dpa is unjustified. **The baseline LHN is 1,090 dpa.**
- 1.10. Notwithstanding the argument that MSDC are setting out in TP-02 that they accord with paragraph 234 (a) of the NPPF (and that their draft housing requirement meets 80% of local need, therefore policies in the 2024 NPPF are not applicable), paragraph 232 identifies that from the date of adoption, a local planning authority must be able to demonstrate a five-year supply of deliverable housing sites, and a Housing Delivery Test score of more than 75% over the previous 3 years. Should this not be the case, then the policies contained within will be deemed to be out-of-date, and the latest calculations for the Standard Method will apply when decision-making on applications applies.
- 1.11. MSDC have 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 on adoption. 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.
- 1.12. On this basis, MSDC will not have a five-year housing land supply in place at the point of submission / adoption (the requirement being  $1,090 \times 5 (= 5,450) + 5\% \text{ buffer } (272.5)$ , giving a figure of 5,722.5 dwellings required over a five-year period). TP-02 identifies in table 19 that their supply in years 1-5 will be 5,632 dwellings. This gives an undersupply of 91 units, and a five year supply position of 4.92 years, with no flexibility for any matters arising that cause a delay in delivery.
- 1.13. The emerging Local Plan is therefore unjustified and ineffective, and not positively prepared based on the stated start point of LHN. The first remedy is to ensure that MSDC’s evidence is

based on 1,090dpa and this is clearly stated in the emerging Local Plan as a baseline housing requirement.

**Issue b) Unmet need from neighbouring authorities and its effect on the plan’s housing requirement**

1.14. Within Annex 3 of the Inspector’s letter to the Council, dated 17th December 2025 (IDJB-01), it identifies that the plan should seek to respond to the declared unmet housing need of neighbouring authorities, placing particular emphasis on Crawley’s unmet need due to its “immediate relevance” to MSDC. In response to the Inspector’s letter, the Council have updated their published housing need and confirmed that the identified surplus housing supply of 1,693 dwellings will solely serve as a contribution to Crawley’s unmet need, making up roughly a quarter of it.

Thakeham contends two points: -

- 1) The 1,693 figures should be treated with uppermost caution as it is based on an incorrect starting point on the baseline LHN. See answer to a).
- 2) Nonetheless, 1,693 still falls short of a fair and reasonable proportion of unmet need of both Crawley and other Housing Market Areas (i.e. Sussex coast).

Housing Need for Northern West Sussex HMA

1.15. The Northern West Sussex Housing Market Areas (“NWS HMA”) comprises of Crawley, Horsham and Mid Sussex, together forming part of a wider Functional Economic Area known as the Gatwick Diamond. **The unmet need from Crawley stands at 7,505 dwellings.** Following a review of the most up to date information on the local housing need and local plan supply from 2023 – 2040, Table 1 shows that there is a clear undersupply in the NWS HMA: -

	Period (adjusted to be the same)	Local Housing Need	Local Plan Supply	Under/Over Supply
Crawley (adopted Local Plan)	2023 – 2040	755 dpa <b>Total: 12,835</b>	Yr 1-5: 386 dpa Yr 6-10: 386 dpa Yr 11-17: 210 dpa <b>Total: 5,330</b>	<b>-7,505</b>
Horsham (emerging Local Plan)	2023-2040	917 dpa <b>Total: 16,398</b>	Yr 1-18: 965 dpa <b>Total: 17,370</b>	<b>+972</b>
Mid Sussex (emerging Local Plan)	2023-2040**	1,090 dpa <b>Total: 18,530</b>	***Completions: 2023-2025 – 2,084 Yr1-15: 16,917 <b>Total: 19,001</b>	<b>+471</b>
<b>Total</b>				<b>-6,062</b>

Table 1: The Local Housing Need/Supply of Crawley, Horsham and Mid Sussex, together forming northern west Sussex Housing Market Authority

\*\**: The period for Mid Sussex has been adjusted to remove the first two years of housing need/supply arrangements set out in the Local Plan. This is so that it aligns with Crawley and Horsham for a more accurate comparison.*

\*\*\**: The numbers have been taken from MS-TP2 – Housing (January 2026) as also reinforced in document H8 Housing Trajectory (12<sup>th</sup> February 2026).*

1.16. Table 1 factors in the most recent housing supply position stated by Horsham District Council in their letter to the Inspector (HDC46 Letter to the Inspector Local Plan Next Steps 22<sup>nd</sup> December 2025), as well as the correct housing need and housing supply figure for Mid Sussex. MSDC’s oversupply position set out in MS-TP02 is predicated on the revision of the minimum housing need figure decreasing from 1,090 to 999dpa. As set out in our response to issue a), this is not an appropriate approach and it should remain at 1,090 dpa. It is also more robust for the plan

period to start in 2023, to align to the baseline LHN, and allows for a fair comparison of the NWS HMA housing need (2023-40).

- 1.17. Crawley's under-provision of 7,505 dwellings is significant, and (once a 5% buffer is applied) given that it is almost certain that none of this under provision will be met by Crawley's other neighbouring authorities, MSDC should be required to undertake a greater share of accommodating Crawley's unmet need since it is in the best position to do so compared to other neighbouring authorities.
  
- 1.18. In the adopted *Mid Sussex District Plan 2014-2031*, it is identified in paragraphs 3.17 & 3.42 that a contribution of 1,500 dwellings are being delivered in the plan towards meeting the unmet needs of neighbouring authorities, with the strategic allocation *DP10: East of Pease Pottage* proposed as a direct response to the unmet needs of Crawley Borough Council. This represented almost a third of Crawley's unmet need at the time – though this was of its time. Taking into account that aside from Mid Sussex, only Horsham could realistically assist with Crawley's unmet need, Thakeham's position is that circa 50% should be delivered in Mid Sussex. **This equates to circa 3,250 dwellings.**
  
- 1.19. Given that the unmet need from Crawley has increased by approximately 50% (from circa 5,000 dwellings to circa 7,505), it would be appropriate for MSDC to seek to increase their contribution by 50% - taking it to circa 3,250 to contribute to neighbouring unmet needs – before applying the suitable buffers to provide resilience over the life of the plan period. There should also be a specific targeted delivery of sites – such as previously occurred at Pease Pottage – which are identified as directly delivering housing in relation to the location of the unmet need.

Housing Need for Other Neighbouring Authorities

- 1.20. Alongside being part of the NWS HMA, Mid Sussex also forms part of the Brighton and East Sussex Housing Market Areas ("BES HMA"). As shown in Figure 1 below, the southern part of MSDC's boundary overlaps with BES HMA's catchment area.

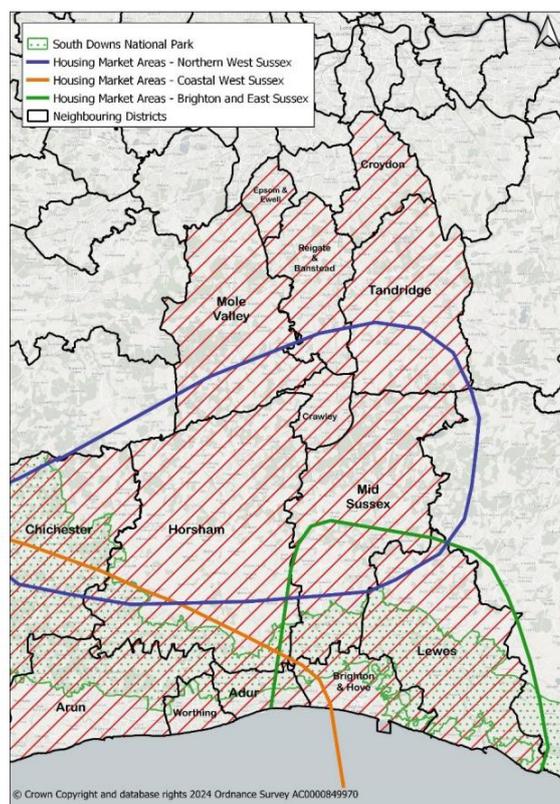


Figure 1: Housing Market Areas, taken from MSDC and Lewes District Council's SoCG

- 1.21. Brighton and Hove City Council currently has a five year housing land supply shortfall of 10,643 dwellings, as evidenced in their adopted local plan (2022). Its capacity for growth is significantly constrained by the coastline and the South Downs National Park, limiting opportunities for urban expansion. Lewes District Council, which also falls within the Housing Market Area of Brighton and East Sussex, has recently published a Regulation 18 plan for public consultation, which has stated that they are not proposing to contribute to neighbouring unmet needs due to a lack of suitable land available. In addition, Adur District Council, which forms a minor part of the HMA, is struggling to meet its own needs in recent years and has not indicated that it will take on any unmet need contribution.
- 1.22. This means that, based on the lack of contribution to unmet need from the authorities within the Brighton and East Sussex HMA, MSDC should be seeking to provide some sort of contribution to Brighton and Hove's identified under-supply of housing.
- 1.23. The Inspector notes within his letter dated 17<sup>th</sup> December 2025 that using Crawley as the basis for the calculation of unmet housing need contribution "*does not mean of course that the unmet needs of other authorities are ignored.*" Despite this, Mid Sussex District Council have not identified allocation for any other neighbouring authorities despite the acute need for housing in the Housing Market Area of Brighton and East Sussex.
- 1.24. Paragraph 26 of the 2023 NPPF states the following:  
*"Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere."*
- 1.25. Based on the evidence aforementioned, and the NPPF requirement on 'maintaining effective cooperation' in the plan-making process, the unmet need contribution from MSDC should be substantially increased in order to justify effective cooperation with neighbouring authorities.

#### Up-to-date Local Housing Need versus Supply – Next Five Years

- 1.26. Another relevant barometer is to assess the up-to-date position is the Standard Method LHN, versus the known five-year trajectory of supply.
- 1.27. In Crawley, the Local Plan will remain up to date until October 2029. For context, the application of the Standard Method would adjust the LHN (lower it), though on the basis of projected supply, this would still result in unmet needs over at least the five year period (2025-30) and beyond.
- 1.28. In Brighton, the Part 2 Plan was adopted in October 2022, but this did not set the housing requirement. This was set in 2016 in the Part 1 Plan. The low housing land supply in Brighton is, in part, owing to the application of the Standard Method as the LHN as the Local Plan is over five years old. This further exaggerates the unmet needs. See Table 2 overleaf.

	Mid Sussex	Crawley	Horsham	Brighton and Hove
<b>*May 2025 Standard Method (dpa) (LHN)</b>	1,358dpa	635dpa	1,338dpa	2,481dpa
<b>LHN Over 5 years</b>	6,790	3,175	6,690	12,405
<b>**Known Supply (2025-30)</b>	5,330	2,916 <sup>^</sup>	2,742	4,480
<b>Difference</b>	<b>-1,460</b>	<b>-259</b>	<b>-3,950</b>	<b>-7,925</b>
<b>Official 5YHLS</b>	5.02 (Housing Land Supply Position as of 1 <sup>st</sup> April 2023)	5.4 (2023-24 AMR, published Nov 2025)	1.7 (Authority Monitoring Report 1 <sup>st</sup> Apr 2024 – 31 <sup>st</sup> March 2025)	1.5 (SHLAA Update 2025, Feb 2026)
<b>***Possible / Reported 5YHLS</b>	3.38 years (Appeal in 02/10/2025 - 3361729)	Circa 6 years in period 2025-30 <sup>^</sup>	1 year (Agreed SoCG of July 2025 - 3365902)	1.7 year (Appeal decision in 18/12/2025 - 33609463)

Table 2: Regional Housing Situation based on up to date Local Housing Needs

*\*Standard Method Figures prepared by Savills Research Team with the adjustment of the 2024 affordability ratio published by the ONS*

*\*\* The information extracted from the LPA's SHLAA and/or latest Annual Monitoring Report, or in the case of Mid Sussex, the H8 Updated Housing Trajectory (published 12th February 2026).*

*\*\*\*Figures derived from the latest planning appeals*

*<sup>^</sup>The figures were calculated based on the Council's Annual Monitoring Report 2023-2024, no new AMR was prepared by the Council at the time of writing (hence a prediction has been made)*

1.29. Table 2 demonstrates a total theoretical shortfall over the forthcoming five year period (2025-30) based on the latest Standard Method LHN. Across the NWS HMA, there is a shortfall of 5,669 dwellings. In Brighton alone, it is 7,925 dwellings. This provides an up-to-date snapshot of the present situation, based on needs and present supply, and may of course alter during the course of the Mid Sussex Local Plan EIP and forthcoming Horsham Local Plan EIP.

**Issue c) Whether the housing requirement needs to be uplifted to meet any other need such as that for affordable housing**

1.30. Thakeham's position is that there is no requirement for a specific uplift in housing delivery required for any other identified need, so long as a) the baseline housing figure utilised is correctly calculated and adheres to the correct method of calculation (1,090dpa) and b) a fair proportion of unmet needs are accommodated. In doing so, the allocation of additional sites that deliver a greater quantum of housing through the plan will be secured, and the delivery of a greater quantum of affordable homes (and homes for other identified specialist needs) will be secured.

**Issue d) Whether a stepped requirement is appropriate**

1.31. A stepped requirement is not objected to in principle, if this allows for a workable plan to be found sound. However, it should be noted that having a stepped trajectory in the current Local Plan (despite being well intentioned) has not been an effective approach to managing housing delivery, as the step in trajectory from 876 (from 2014/15 until 2023/24) to 1,090 (from 2024/25 to 2030/31) has only just been engaged.

- 1.32. With that step engaged, the housing to be delivered in accordance with the plan is approximately 300dpa behind where the current housing position currently sits (when measured through the new Standard Method), and at this time MSDC are not able to demonstrate a five-year housing land supply.
- 1.33. This would suggest that the application of a stepped trajectory may not help in achieving the Government's aim of boosting housing delivery over time, as the 'step up' has evidentially not been delivered in the current Local Plan.
- 1.34. Thus, ahead of consideration of the soundness of a stepped trajectory, should be the identification of a suitable mix of site allocations (in scale and location) to maximise delivery – where they are most needed. Thakeham notes that its strategic allocation DP10: East of Pease Pottage, well located to meet Crawley's need, has now been delivered in full, over an 8-year period (2017-2025).

END

**Words: 2,720**