



THAKEHAM

District Plan Examination

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

**Hearings Statement relating to: Matter 3 – Homes to meet the  
needs of all the community**

Submitted by Thakeham Homes

## **Matter 3: Homes to meet the needs of all the community**

### **Whether the plan's policies will enable enough homes to come forward to meet the needs of all groups.**

#### ***Issue a) The plan's proposals in respect of a mix of sizes and types of home***

- 3.1. As set out in the Inspector's letter idjb-02 (Inspector's comments on development management policies), the Inspector has reservations on the wording of policy DPH7 *Housing Mix*, and has set out how the policy wording should be amended in order to make it a starting point. This approach is agreed with, as flexibility is key to be able to meet changing market demands.
- 3.2. However, the wording of Policy DPH12 Accessibility is objected to, as it will severely impact on the deliverability of housing across the District, and the size and types of homes that can be delivered as a result. The requirement in the policy to have all housing delivered as M4(2) is overly onerous and out of step with emerging national policy.
- 3.3. Whilst it is recognised as being a potential policy route identified in paragraph 8.76 of the SHMA, it is also recognised in paragraph 8.74 of the SHMA that such an approach would result in viability challenges. It is identified in paragraph 8.20 of the SHMA that "The Council should ensure that the viability of doing so is also tested as part of drawing together its evidence base although the cost of meeting this standard is unlikely to have any significant impact on viability". A viability study was conducted on behalf of MSDC that has identified the financial cost per unit. The financial findings of the viability study are not disputed, but what has not been appropriately considered is the additional land and internal space required to appropriately delivering such units. Through enforcing a blanket M4(2) approach, the Council's desire to increase densities or deliver at the identified densities will face challenges in delivering the quantum of homes envisaged. It is also unquestionably inconsistent with the emerging draft NPPF (2025) position.
- 3.4. As set out in the opening paragraph of the Inspector's letter idjb-02, policies in the plan should be consistent with the NPPF. Whilst not yet adopted, the consultation document on proposed changes to the NPPF identifies that the Government will seek to secure 40% of new housing delivered through a Local Plan built to the M4(2) or M4(3) Building Regulations standard. The policy wording should be amended to direct the provision of M4(2) and M4(3) units to be in accordance with national policy. This will assist delivery.

#### ***Issue b) Affordable housing***

- 3.5. As addressed in Matter 1 (c), Thakeham's position is that there should be suitable delivery of affordable housing, so long as the baseline housing figure utilised is correctly calculated and adheres to the correct method of calculation and a proportion of unmet needs are accommodated. In doing so, the allocation of additional sites above that baseline figure (to meet identified neighbouring unmet need), and the application of an appropriate buffer above that housing need will secure delivery of a greater quantum of housing through the plan. In delivering a greater quantum of homes in the plan, the delivery of a greater quantum of affordable homes (and homes for other identified specialist needs) will be secured.

#### ***Issue c) Homes for older people***

- 3.6. No comment.

#### ***Issue d) The provision of accessible homes***

- 3.7. No comment.

#### ***Issue e) The provision of student accommodation and other specialist accommodation***

- 3.8. No comment.

***Issue f) Self-build and custom homes***

- 3.9. Thakeham understand that there is a need to ensure that a suitable quantum of Self and Custom Build housing to come forward through the plan, and support the provision of such units to meet need/ demand. However, the approach set out in the emerging Local Plan is not supported in its current form as it is excessive and significantly exceeds the requirements and need. It is unjustified.
- 3.10. Policy DPH6: *Self and Custom Build Housing* sets out that a minimum of 2% of the residential plots on housing sites of 100 or more dwellings will be required to be delivered as self-build or custom build plots. Of the proposed site allocations set out in the initial submission plan, this would see 10 sites captured and approximately 142 plots delivered. It is understood that the current self-build register totals just 28 different applicants.
- 3.11. Given the number of potential applicants seeking a self-build/custom build dwelling on MSDC's register, the proposed policy is unjustified and ineffective as it does not reflect the identified need in the District and will deliver nearly 5 times the required level of housing – at the cost of market/ affordable homes. It therefore requires reconsideration.
- 3.12. It should also be noted that through Policy DPH6, the delivery of just one of DPSC1, DPSC2, or DPSC3 would see the entirety of the self-build/custom build register delivered by one site – which potentially amounts to an unfair distribution (based on the first site consented). DPH6 also makes no allowance for site-specific circumstances (e.g. Burgess Hill station, where the only opportunity would be for a self/custom build flat). Therefore, as worded, the policy is ineffective and requires revision.

***Issue g) Rural housing***

- 3.13. No comment.

***Issue h) Rural exception sites***

- 3.14. No comment.

***Issue i) Sites to meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople***

- 3.15. No comment.

END

**Word Count: 909**