



THAKEHAM

Mid Sussex District Council District Plan 2021 – 2039 Examination

Matter 6 Hearing Statement - Housing

September 2024

Regulation 19 Response IDs:

- 1189800
- 1191281
- 1187538
- 1187734
- 1191000
- 1191190
- 1191219
- 1191735

Matter 6: Housing

Issue 1: Whether the Council's approach to calculating its full, objectively assessed needs and housing requirement is justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?

Objectively Assessed Need-Housing

57. Does the Plan period cover an appropriate time frame for the provision of housing (2021-2039) consistent with national policy? If not, what would be the implications for housing need?

As part of its Proposed Modifications to the Regulation 19 District Plan, Mid Sussex District Council (MSDC) is proposing an extension to the Plan period to 2040, to ensure compliance with paragraph 22 of the National Planning Policy Framework which requires strategic policies to look ahead over a minimum 15 year period from adoption; this would extend the plan period from 18 to 19 years. This is explained by MSDC in Paragraph 16 of the Housing Need and Requirement Topic Paper (July 2024).

As such, whilst we object to the Plan period as set out in the Regulation 19 Plan on the basis that it would be in accordance with paragraph 22, we support the proposed modification to the Plan period; which would cover an appropriate time frame for the provision of housing, in accordance with national policy.

58. To determine the minimum number of homes required, housing policies should be informed by the Government's local housing need methodology. As such, are the inputs used to determine the level of housing needed within the Plan appropriate?

Yes. The District Plan as submitted, identifies the Standard Method as 1,090dpa, but since the latest affordability ratios have been published, the calculation reduces the Standard Method calculation to 1,039 dwellings per annum (as at 1st April 2024). This is used in the calculation of housing need and delivery set out in M67 of DP2 (Schedule of proposed modifications) and the calculation of this figure is outlined in detail within the submitted Housing Need and Requirement Topic Paper.

59. Are there exceptional circumstances to suggest that an alternative approach be taken? If so, what are they, and how would they impact on housing need? Is the Strategic Housing Market Assessment 2021 (H1) up to date and justified?

The SHMA (dated 2022) concludes (p.68) that there is no evidenced justification or exceptional local circumstances that support an approach other than using the standard method. Thakeham would agree that the Standard Method is the most appropriate means of calculating local housing need.

60. What are the implications, if any, of the Gatwick Airport's proposed extension and DCO on the demand for housing? Does the OAN set out within the submission Plan of 19,620 remain appropriate?

Thakeham has no comment to make on the implications of the DCO at Gatwick Airport, which are unknown at present.

However, if through the Examination, it is concluded that the DCO would result in an increase to housing demand in the local area, we consider the north-western part of Mid Sussex District to be the logical geographical area to accommodate growth (specifically Pease Pottage). Further growth in this area would also be the optimum location to contribute towards the unmet housing needs of the Northern West Sussex Housing Market Area.

Otherwise, we would expect this to be accounted for in the subsequent 5 yearly Plan Review process.

Affordable housing

61. Is the figure of 470 affordable homes per annum set out in the SHMA (H1), split between rented and owned homes, subject to S106 control, based on appropriate evidence?

Thakeham considers the annual affordable homes figure to be based on appropriate evidence.

Gypsies and Travellers and Travelling Showpeople

62. Is the plan clear as to the identified need for additional pitches, including for those who no longer travel, as well as transit sites for Gypsies and Travellers, and travelling show people? Is the April 2022 Gypsy and Traveller Accommodation Assessment (GTAA) (H2) consistent with the December 2023 version of the Planning Policy for Traveller Sites? If not, would this impact on the need for additional pitches?

No comment.

63. Are there other considerations that are likely to drive an increase in need locally, such as any needs that cannot be met within neighbouring areas?

No comment.

64. Is the identified need supported by a robust, up-to-date, and credible evidence base consistent with the 'Draft Guidance to local housing authorities on the periodical review of housing needs - Caravans and Houseboats DCLG 11 March 2016'?

No comment.

Other specialist needs

65. How have the needs of other caravan dwellers and houseboat dwellers been considered within the Council's evidence base?

No comment.

66. What assessment has taken place of the needs of particular groups by household size, type, and tenure, including self-build and custom housebuilding? What assumptions have been made to calculate the need for specialist housing: for example, housing for older people, and for households with specific needs, to offer a better choice of housing? Are these assumptions justified and consistent with national policy?

No comment.

Housing Requirement

67. Is a minimum housing requirement of 19,620 justified and consistent with national policy? What is the status of the 996 dwellings referenced within the table in Policy DPH1 as total under/over supply for resilience and unmet need? Should this figure be included within the annual housing requirement for the district?

Thakeham wholly supports the principle of MSDC meeting its housing need in full, and providing an oversupply of housing. However, there is a lack of clarity relating to the oversupply and its purpose, as such, we would object on this matter, but recognise that this could be remedied through Main Modifications.

Policy DPH1 of the Regulation 19 Plan states the minimum housing requirement is 19,620 dwellings, the submitted Housing Need and Requirement Topic Paper (dated July 2024) outlines a revised requirement figure of 20,783 (12,183 homes of completions and commitments (confirmed at para 30) and 8,600 homes of housing supply (confirmed at para 94)). These amendments are proposed as Main Modifications (M67 of DP2) to the Plan to reflect the latest position on housing need and to ensure the Plan period is consistent with national policy. This is supported.

The figures set out result in an 'over-supply' of 996 (Reg 19 figure) or 1,042 dwellings (proposed Main Modification), this is identified as 'resilience against non-delivery, and unmet need of neighbouring authorities' (as confirmed by para 95 of the Housing Need and Requirement Topic Paper). Thakeham submit that MSDC should identify the purpose of the over-supply to ensure clarity - it cannot be both. If it is to meet unmet needs, MSDC should identify what need it is contributing towards. Alternatively, if this over-supply is a buffer to ensure flexibility and resilience in the Plan, to protect against non-delivery, then it should be identified as such.

68. Are there other considerations that are likely to drive an increase in the homes needed locally, such as any needs that cannot be met within neighbouring areas namely the 30,000 dwellings of unmet need identified up to 2050 in the Coastal West Sussex and Greater Brighton authorities, Housing Need and Requirement Topic Paper (HNRTTP) (H5), and the more immediate housing needs of Crawley, Brighton and Horsham?

The 'Northern West Sussex Housing Market Area Statement of Common Ground: Housing' confirms there is an unmet housing need of 8,947 homes, within the combined areas of Crawley Borough, Horsham District and Mid Sussex District. These needs predominantly arise from Crawley which is constrained by its administrative boundaries.

The considerations that are likely to drive an increase in homes needed locally include:

- Crawley Borough – is fundamentally constrained by the limitation of available/developable land within its jurisdiction, resulting in persistent under-delivery and increasing unmet

housing need (accordingly, it is only seeking to meet c.40% of its identified housing need within its draft Local Plan).

- Horsham District – is constrained by Water Neutrality (accordingly, it is only seeking to meet c.85% of its identified housing need within its draft Local Plan).

Should the Inspector, through examination of the Plan, conclude that the Council should seek to address some of the unmet needs in the Northern West Sussex Housing Market Area, then we submit that the Council could revisit the evidence base and allocates sites through Main Modifications to the Plan, which could be undertaken within a short period of time to ensure that the examination is not unduly delayed.

69. If so, are there any policies within the Framework that protect areas or assets of particular importance that provide a strong reason for restricting the overall scale, type or distribution of housing, within the plan area; or would any adverse impacts of meeting the Council's OAN and the unmet needs of others significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework as a whole?

No comment.

70. Is the requirement for Older Person's Housing and Specialist Accommodation (DPH4); DPH5: Gypsies, Travellers and Travelling Showpeople and DPH6: Self and Custom Build Housing justified and positively prepared?

No comment.

71. What is the housing requirement for each designated neighbourhood area?

No comment.

72. Are any main modifications necessary for soundness, if so, why?

Thakeham does not wish to make comment.