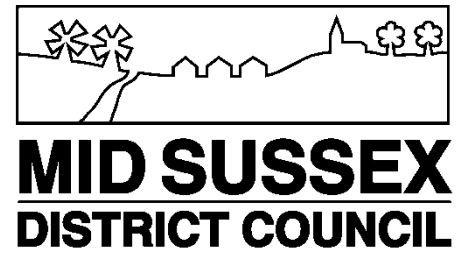


Mid Sussex District Council



District Plan Examination

Mid Sussex District Council Response to Inspector's Questions for Examination Hearings (ID3)

Housing Matters

November 2016

1. Evidence base

1.1 Do the West Sussex SHMA (2009), the Northern West Sussex SHMA (2012), the Housing and Economic Development Needs Assessment (HEDNA) (February 2015), the HEDNA Update (November 2015) and the HEDNA Addendum (June 2016) constitute an adequate evidence basis for the assessment of the District's Objectively Assessed Housing Need (OAN)?

The Council has carefully followed the detailed Planning Practice Guidance (PPG) with respect to assessing its Objectively Assessed Need for housing. The HEDNA documents in particular are based on the Scope and Methodology set out in the PPG and follow examples from other authorities, best practice, and advice offered by organisations such as the Planning Advice Service (PAS).

The information and analysis within these studies provides a robust and transparent justification for the Objectively Assessed Need, in accordance with the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), undertaking each required step in turn. Each document plays its part in setting out the evidence required to establish the OAN. The Council is therefore satisfied the District Plan is sound in this regard.

- 1.1.1. NPPF paragraph 159 requires Local Planning Authorities to prepare a Strategic Housing Market Assessment in order to establish the Objectively Assessed Need (OAN) for housing. For Mid Sussex, the SHMA required by the NPPF is represented by the HEDNA and its updates which account for new population and household data releases.
- 1.1.2. Planning Practice Guidance ("Housing and Economic Development Needs Assessments", section 2a) sets out the scope and methodology for undertaking such assessments. This formed the basis for the methodology employed by the HEDNA (EP20, February 2015), as explained in paragraphs 1.11-1.18 and the diagram on pages 4-5.
- 1.1.3. Table 1 shows the process outlined in the PPG and where these steps have been undertaken within the evidence base:

OAN: PPG Scope and Methodology	Evidence Base
Establish the relevant functional area (i.e. for OAN, the Housing Market Area) (<i>paras 08-011</i>)	Originally undertaken within the West Sussex SHMA (EP24, 2009), updated in the Northern West Sussex SHMA (EP25, 2012). The HEDNA (EP20, February 2015) confirmed the HMA in paragraphs 2.30-2.78 by analysing the various data sources suggested by the PPG in para 011.
Establish the Starting Point using the latest CLG Household Projections (<i>para 015-016</i>)	HEDNA (EP20, February 2015) paras 3.1-3.19 established the starting point as 570dpa using a blend of CLG 2008/2011-based household projections. The HEDNA Update (EP21, November 2015) paras 3.1-3.43 increased this figure to 656dpa on the basis of new CLG 2012-based household projections. A further increase to 714dpa was made within the HEDNA Addendum (EP22, August 2016) to account for the latest CLG 2014-based household projections.
Consider sensitivity testing and make adjustments as necessary (<i>para 017</i>)	HEDNA (EP20, paras 3.20-3.32) considered past migration trends and the impact these

	would have had on population/household projections. Following representations received during consultation, the HEDNA Update (EP21, section 4) uplifted the starting point OAN to allow for vacant dwellings and took account of the ONS Mid-Year Estimate data that had been recently released. The HEDNA Addendum (EP22, paras 1.30-1.37) confirmed previous sensitivity testing was still valid.
Take Employment trends into account (<i>para 018</i>)	HEDNA (EP20, section 5) analyses the employment evidence (primarily the Northern West Sussex Economic Growth Assessment, EP35), outlining future jobs growth and the balance between jobs and houses. The HEDNA Update (EP21, section 7) updates this section based on the new household projections and updated economic evidence in the Burgess Hill Employment Sites Study (EP36). The HEDNA Addendum (EP22, paras 1.54-1.60) further updates this exercise.
Analyse 'Market Signals' and make an adjustment as necessary (<i>paras 019 – 020</i>)	The HEDNA (EP20, section 4) provides extensive analysis of the market signals, analysing the various data sources suggested by the PPG in para 019. It suggested an arbitrary uplift of 10% even though Mid Sussex was not an isolated case and performed similarly to comparative areas. The HEDNA Addendum (EP22, section 5) confirmed the former analysis was still up-to-date and relevant, but updated the methodology to accord with similar methodologies employed within the South East (particularly neighbouring Horsham District). An uplift of 24dpa was applied. The HEDNA Addendum (EP22, paras 1.38-1.44) confirmed that this approach was still up-to-date and relevant.
Address the needs for all types of housing (<i>para 021</i>)	The HEDNA (EP20, paras 4.108-4.175) assesses housing stock, growth in household type, tenure composition, and needs of different groups using the data sources suggested within the PPG para 021. This builds upon the information published within the West Sussex SHMA (EP24) and Northern West Sussex SHMA (EP25). The HEDNA Addendum (section 2) assesses housing for older people (use class C2) based on new findings.
Calculate affordable housing need (<i>paras 022 – 029</i>)	The West Sussex SHMA followed the (now deleted) SHMA guidance and established the affordable housing need. This was updated in 2012 and again in 2014 (the Affordable Housing Needs Model Update, EP26). The HEDNA (EP20, paras 4.153-4.172) presented this information. The HEDNA Update (EP21, section 6) re-calculated the affordable housing need based on new household projections, updates to the Mid Sussex housing register, and

	monitoring records. The HEDNA Addendum (EP22, paras 1.47-1.53) re-establishes affordable housing need based on new household projections and proposed changes in policy such as starter homes.
--	--

Table 1 - Compliance with the PPG

- 1.1.4. The above demonstrates a comprehensive approach to establishing the Objectively Assessed Need. Each PPG step is followed in detail in a transparent way. It is therefore considered that the OAN evidence is more than adequate.
- 1.1.5. The evidence base on OAN contributes to a sound District Plan:
- Positively Prepared: The housing need evidence has been updated to account for new data releases and revised guidance, therefore the OAN is the most up-to-date at the time of submission. The OAN and housing provision within the District Plan have been increased at various points during the plan making process to account for this new evidence and to ensure that housing need is met.
 - Justified: Proportionate evidence, in the form of the SHMAs and HEDNAs, has been prepared in order to directly influence the plan strategy. Information from this evidence base has been assessed against reasonable alternatives through the Sustainability Appraisal; however these alternatives are rightly focused on supply rather than need (which is a 'set', objectively assessed figure).
 - Effective: Whilst this test is not directly related to the housing need evidence, the Plan is effective in ensuring that housing provision is made in excess of the OAN to assist in meeting unmet need of neighbouring authorities.
 - Consistent with National Policy: National Policy dictates that the Plan should be based on an objective assessment of housing need (within a SHMA/HEDNA) and the PPG provides the guidance and methodology for doing so – this has been closely adhered to and the plan is based on evidence that is consistent with national policy.
- 1.1.6. The main criticism from representors has been that the HEDNA and its updates have not been prepared on a Housing Market Area (HMA) basis, and instead only looks at Mid Sussex in isolation.
- 1.1.7. Whilst the NPPF requires the OAN to be established on a HMA-basis, it has not been practical or feasible to undertake this exercise within one assessment, as the three authorities within the primary HMA (Northern West Sussex authorities - Mid Sussex, Crawley and Horsham) have been at different stages of plan preparation throughout the process. However, the Northern West Sussex authorities discussed the methodologies of their assessments to ensure they were compatible.
- 1.1.8. A benchmarking exercise was undertaken to ensure compatible methodologies were used, with compatible results – this is explained within the North West Sussex Position Statement (Appendix 2, BP17). The three authorities are content that the separate studies are compatible with each other, enabling the results to be considered together in order to get the HMA-wide picture. In particular, the HEDNA Update (EP21) uses the same methodology as Horsham's Housing Need Assessment (RD21, 5.31-5.39) to ensure compatibility of approach across the HMA. Crawley also used the same methodology to apply an uplift to OAN to account for affordability issues, however their Inspector did not feel that the market signals data justified making an uplift. Both Crawley and Horsham have a sound plan based on an 'individual' assessment of housing need as opposed to a HMA-wide assessment.
- 1.1.9. In general, representations received do not question the quantity or quality of housing need evidence per se, and have not criticised the evidence for not undertaking any one of the

steps outlined in the PPG. Issues raised relate to the interpretation of data and its application (for example, the amount of uplift to be applied to account for market signals), to which the Council responds under the relevant questions in this statement. Representations concerning the HEDNA constraining OAN were not received at Focused Amendments stage, as the HEDNA had been revised (November 2015) to address this issue and make clear that this was not the case. Similarly, representations related to the HEDNA not using the most up-to-date data are no longer relevant, as the HEDNA has since been updated twice (Update - November 2015, Addendum - August 2016) to account for the latest population and household data releases.

- 1.1.10. The Council is confident that the combination of evidence base studies, focussed on the HEDNA documents, provides a robust and transparent assessment of housing need within the District, in accordance with the NPPF. The Planning Practice Guidance has been followed and each step required by this guidance is incorporated within the HEDNA. The Council is therefore satisfied that the District Plan is sound, on the basis that the evidence underpinning its housing need is adequate.

2. Calculation of the OAN

2.1 Are the calculations that have led to the OAN starting point of 714dpa sound?

The Council has carefully followed the NPPF and guidance within the PPG to establish the OAN and undertaken sensitivity analysis to understand the effects of different assumptions, especially those suggested by representations. The first step in the methodology has been to establish the ‘starting point’, which (as advised by the PPG) is the Government’s household projections.

The latest household projections (the 2014-based projections released in July 2016) calculate a starting point of 714dpa for the plan period 2014-2031. This is an increase compared to previous (2012-based) projections which indicated 656dpa. The Council took account of this revised starting point and increased the overall OAN within the HEDNA Addendum (EP22) to 754dpa, accounting for sensitivity testing, vacancy rates and market signals.

The Council has therefore positively and proactively updated the evidence base, based on newly released information, to ensure the District Plan is based on the most up-to-date evidence at the time of writing.

The Starting Point – CLG Household Projections

- 2.1.1. The PPG states that calculating OAN is not an exact science (para 014) but does set out the basis for undertaking such an assessment. The PPG clearly states that the Department for Communities and Local Government (DCLG) household projections should provide the starting point estimate of overall need (para 015).
- 2.1.2. The HEDNA (EP20), HEDNA Update (EP21) and HEDNA Addendum (EP22) each relied on the most up-to-date CLG projections at the time they were written. The release of new household projection data prompted each subsequent update, to ensure that the evidence base remained current and reflective of the overall need for housing within the District.
- 2.1.3. The HEDNA (EP20) was based on a starting point OAN of **570dpa**, based on a blend of CLG 2008/CLG 2011-based household projections. This approach was taken as the 2011-based projections did not cover the entire plan period, and were thought to be heavily influenced by the recession (i.e. trends in reduced home ownership were projected forward,

which could potentially underestimate the actual level of housing need). Using the pre-recession 2008 data for some of the plan period provided a ‘sense check’ and best estimate of housing need given the evidence available. Using the 2008-based data for the whole period would reflect pre-recession headship rates for the whole period i.e. anticipates the housing market to have already returned to pre-recession levels. This is not reflected by the latest data, and would therefore be unrealistic, potentially over-estimating housing need.

- 2.1.4. The HEDNA Update (EP21) revised the OAN to account for CLG 2012-based household projections, which had been recently released. This established a starting point of **656dpa**. These projections covered the entire plan period and made adjustments to the Household Representative Rates (i.e. ‘Headship Rates’) to better reflect the recession, meaning the ‘blend’ approach used in the HEDNA wasn’t necessary. Representatives at the Focused Amendments stage were largely supportive of this update, and commented that the CLG 2012 data was the best available at that time.
- 2.1.5. A further set of household projections was issued in July 2016: CLG 2014-based household projections. These accounted for the most recent ONS population projections data which was released in early 2016. Based on the new projections, the starting point OAN was established as **714dpa** within the HEDNA Addendum (EP22). At the time of writing (November 2016) the PPG still states that the CLG 2012 data is the most up-to-date, however the Council has had regard to the advice in para 016 and updated the HEDNA to reflect the most up-to-date CLG 2014 data.

Sensitivity Testing

- 2.1.6. To ensure their robustness the Council has undertaken a range of sensitivity analysis, relevant to the starting point, to ensure that the DCLG figures remains the most robust. This analysis reflects the scope of past representations on this issue including:
- The influence of past trends on the projections (as described in the PPG)
 - The validity of headship rates
 - The effect of trends in the wider HMA and in other neighbouring authorities;
 - The effect of the plan period and plan base date;
 - The effects of migration trends.
 - Adjustments for vacant dwellings (‘vacancy rate’)
- 2.1.7. A brief summary of the main findings of these analyses is provided below.

The influence of past trends on the projections

- 2.1.8. The PPG states that the starting point may require adjustment to reflect factors affecting local demography and household formation rates not captured in past trends.
- 2.1.9. The HEDNA (EP20, paras 3.20-3.32) undertook sensitivity testing to confirm the examples of ‘local circumstances’ in para 017 of the PPG were not relevant for Mid Sussex, and therefore confirm the CLG projections data as published is the most relevant dataset to rely on for estimating future household growth.
- 2.1.10. The HEDNA explains that there have been no ‘one-off’ events in the past which may affect future trends. There have been no ‘spikes’ in migration which could not be expected to occur again, and therefore there is no evidence to suggest that the migration element of the population projections should be adjusted to better reflect local circumstances.
- 2.1.11. The HEDNA Update (EP21, paras 3.8-3.37) undertook two important sensitivity tests:

- A comparison between Household Representative Rates between the old (2008/2011 based) and new (2012-based) projections in order to understand the differences.
- Analysis of ONS Mid-Year population estimates (June 2015), which were not reflected in the household projections.

2.1.12. The comparison between projections showed that there were some uncertainties with the newer data. In particular, CLG 2012 produced a higher figure than the pre-recession CLG 2008 data, which was a surprise given the change in economic circumstances (para 3.22). There were also some uncertainties regarding the reliability of the data, potentially over-estimating household growth (para 3.32-3.35). In any case, the Council deemed that this data was the best available data at that time. Having regard to the PPGs advice that this data should be used as it was statistically robust; the Council concluded that it represented the starting point for OAN.

Trends in the wider housing market area

2.1.13. The effect of the 2014-based projections were considered for the wider housing market area. The analysis concluded that while the projections for Mid Sussex have increased relative to those in the previous 2012-based projections, the requirement for neighbouring authorities including those in the NW Sussex HMA area have marginally decreased.

2.1.14. The analysis was undertaken for the three key neighbouring authorities: Crawley, Horsham and Brighton and Hove. Each of these areas uses a different plan period to Mid Sussex, so the figures have been calculated twice: once for their own plan period, and once to match the District Plan period of 2014-2031.

Authority	Plan Period	CLG 2012 (dpa)	CLG 2014 (dpa)	Difference (dpa)
Mid Sussex	2014-2031	656	714	+58
Crawley	2015-2030	582	579	-3
Horsham	2011-2031	595	591	-4
Brighton & Hove	2011-2030	1,264	1,275	+11
Neighbours Total				+4

Table 2 - Individual Plan Periods

Authority	Plan Period	CLG 2012 (dpa)	CLG 2014 (dpa)	Difference (dpa)
Mid Sussex	2014-2031	656	714	+58
Crawley	2014-2031	580	579	-1
Horsham	2014-2031	610	602	-8
Brighton & Hove	2014-2031	1,283	1,280	-3
Neighbours Total				-12

Table 3 - Aligned with District Plan period 2014-2031

2.1.15. Using their individual plan periods, housing need for these neighbours has marginally increased, but at a level lower than Mid Sussex. Using the Mid Sussex plan period, housing need for these neighbours has fallen by 12 dwellings per annum, whilst Mid Sussex has grown by 58 dwellings per annum.

2.1.16. The differences between CLG 2012/2014 for neighbouring authorities is marginal, however the level has increased significantly for Mid Sussex. The HEDNA Addendum (EP22, para 1.28) explains that the difference between CLG 2012/2014 was solely population based, as

opposed to a change in headship rates. The increase in households for Mid Sussex between the two datasets demonstrates a population rise at a higher rate than previously expected, whilst neighbouring authorities have remained 'on trend'. This increase in population for Mid Sussex may be a reflection of higher than expected levels of in-migration – particularly from Brighton & Hove as this areas has high levels of unmet need.

- 2.1.17. It was therefore considered that the CLG 2014 data best reflects recent trends in in-migration that reflects unmet need from neighbouring authorities – predicting this trend will continue throughout the plan period. On a wider housing market basis, the trends are considered robust and require no further adjustment.

Sensitivities to the base date of the plan

- 2.1.18. Some representors feel that the District Plan (and its OAN) should be based on a 2011 start/base date.
- 2.1.19. In reality, rolling back to a 2011 start date would make no difference to the OAN, as can be demonstrated using the CLG 2012 and CLG 2014 data:

	2011	2014	2031	2011-2031	2014-2031	Difference
CLG 2012	57,604	59,363	70,507	12,903 (645dpa)	11,144 (656dpa)	+11
CLG 2014	57,599	59,738	71,876	14,277 (714dpa)	12,138 (714dpa)	0

Table 4 - CLG Projections

- 2.1.20. The latest household projections are from a 2014 base which aligns with the District Plan period and it therefore makes logical sense that these are used. Rolling back to using older data sources, or blends of older/newer data risks unreliability in the projections and assumptions or adjustments to the data that may increase uncertainty and be unjustified.

The effects of migration trends

- 2.1.21. The Sub-National Population Projections (SNPP) that form a component of the CLG Household Projections are based on trends in births, deaths and migration. One representor suggests that allowances should be made for the population projections potentially under-estimating migration. This is because the trend in SNPP is over a short 5-year period that included the recession and that the more up-to-date National Population Projections and ONS Mid-Year Estimates would show a higher level of migration than the SNPP suggests. They therefore conclude the starting point should be adjusted upwards to take this into account.
- 2.1.22. The HEDNA Addendum (EP22) advocates using the recently released (July 2016) CLG 2014 Household Projections, as suggested in the PPG. These in turn are based on the most up-to-date SNPP (May 2016). This being the case, they have reflected the National Population Projections and latest ONS Mid-Year Estimates. Therefore, any concerns regarding the 2012-based SNPP used in the HEDNA and HEDNA Update will have been addressed through the use of newer 2014-based SNPP data.
- 2.1.23. Migration trends from neighbouring authorities have remained largely flat over the period 2002-2015, despite the economic cycle (figure 1). Any increases over this time will be incorporated within the population projections as they are based on trends. The population trends form a component of the household projections. There is no reason (based on these

trends) to suggest that other areas are likely to ‘spike’ or significantly increase over the plan period, and therefore the starting point OAN doesn’t require further adjustment.

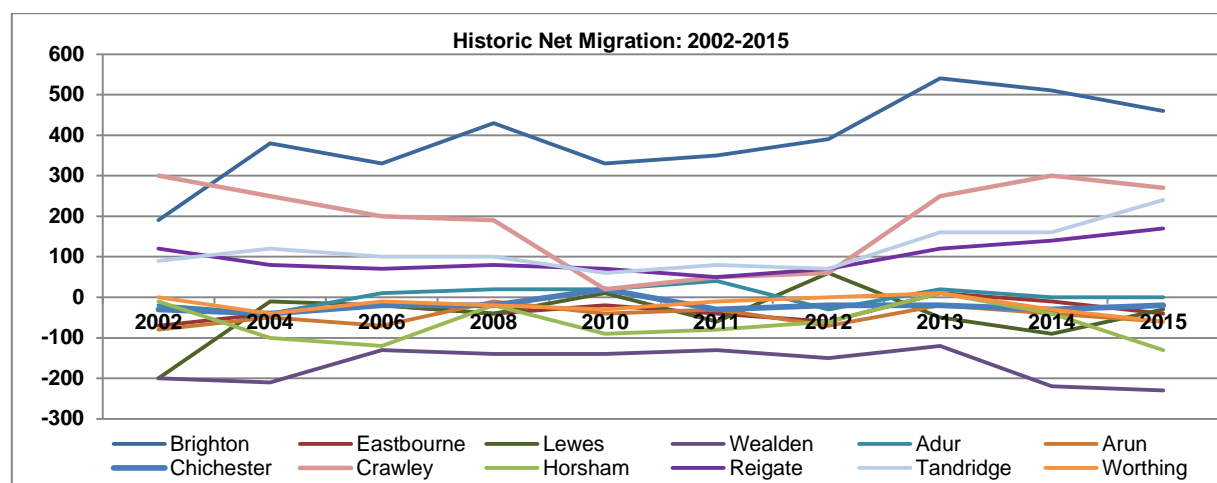


Figure 1 - Historic Net Migration (Source: ONS Square Matrix of Moves – 2002-2015)

Uplift for Vacancies

2.1.24. As part of sensitivity testing, the HEDNA Update (EP21, paras 4.6-4.9) and Addendum (EP22, paras 1.33-1.37) propose an uplift to reflect vacancies. Representatives at Pre-Submission stage suggested that this uplift was necessary, and a review of best practice also confirmed that this was the case. Therefore a vacancy rate of 2.3% was applied (based on the Census 2011 findings) to uplift the figure. Further analysis within the HEDNA Addendum showed that 2.3% was potentially too high given more up-to-date data, but the Council decided to continue using this figure as a ‘worst case’ scenario. Representations received at Focused Amendments stage suggest a vacancy rate higher than 2.3%, although this would not reflect the evidence from Census and CLG as shown in the HEDNA Addendum (EP22, tables 5 and 6). This approach aligns with that used at Horsham, as well as numerous other authorities in this area.

2.1.25. The update and addendum to the HEDNA to reflect new data and best practice demonstrates the Council places great significance on ensuring the District Plan is positively prepared and reflects the most up-to-date evidence, consistent with the requirements of the NPPF to ensure Local Plans are kept up-to-date. The Council has had regard to the steps outlined in the PPG to determine the starting point, sensitivity test and make any adjustments as necessary and this is comprehensively documented within the HEDNA documents.

2.1.26. The figure of 714 is only the starting point. Further adjustments are made to this figure in order to establish the final OAN based on Market Signals.

2.2 Have appropriate adjustments been made to the starting point of the OAN to reflect market signals? In particular, is the figure of 24dpa adequate to reflect affordability issues and trends?

The HEDNA (EP20, section 4) comprehensively analyses the market signals outlined in the PPG (para 019), using the most up-to-date data available at the time of its writing and making appropriate comparisons with the Housing Market Area, neighbouring authorities, the County, region and nationally. Whilst Mid Sussex is not a unique case in terms of affordability, and shows similar characteristics to adjacent authorities, an uplift to account for market signals has been factored in. A calculation has taken place, following the same methodology as neighbouring authorities and other examples in the South-East Region, which derives an uplift of 24dpa.

- 2.2.1. The approach found sound at Horsham and Chichester (and part of the Inspector's conclusions on OAN at Arun) involves identifying the age cohort that would most likely have been affected by affordability constraints (particularly as a result of recession and reduced access to finance). This work has identified the 20-34 age group as the group most likely to want to join the housing ladder, but least likely to be able to financially do so – this is based on trends in tenure showing reduced home ownership in this age group over time (EP21 Tables 13 and 14). A similar approach was used at Crawley, however the Inspector there felt the market signals indicators did not justify an uplift.
- 2.2.2. As a result of this analysis, and comparison between household representative rates pre- and post-recession, an uplift of 24dpa has been applied. This is a logical and robust calculation to increase housing supply to assist with affordability for the age groups that require the most assistance. This number, when added to the starting point OAN, is consistent with the principles of sustainable development.
- 2.2.3. The main issues raised in representations was of the need for a larger 10% uplift. The ongoing justification for this remains unclear with the main basis being that the Council suggested such an uplift in earlier versions of the HEDNA.
- 2.2.4. However, this figure is arbitrary and not based on evidence. Unlike the Council, none of the representors have shown a calculated approach to settling an uplift figure. The Council feel that an increase higher than 24dpa:
- Is not justified by evidence
 - Would be inconsistent with the approach taken by nearby authorities, particularly the two authorities within the same primary Housing Market Area
 - Would be a figure disproportionate to the market signals analysis which does not demonstrate a severely worsening trend in affordability or any affordability issue unique to Mid Sussex in comparison to the region as a whole
 - Would not be consistent with the principles of sustainable development (as the Sustainability Appraisal demonstrates a housing requirement in excess of 800dpa would not be sustainable)
 - Would (bearing in mind the environmental capacity of the District) limit the amount of households the District could contribute towards meeting the unmet need of neighbouring authorities.
- 2.2.5. PPG para 020 advises that, after comparison with longer term trends across a number of geographies, a worsening trend in any of these indicators will require an upward adjustment to planned housing numbers – notably it does not suggest how much of an adjustment should be made, or how to calculate it, aside from the fact it should be “a level that is reasonable”.

2.2.6. Analysis in the HEDNA, based on DCLG statistics, does not suggest a rapid or severe worsening affordability in the District (paras 4.10 – 4.54 are most relevant). In terms of the affordability evidence:

- median house prices in Mid Sussex follow the same trend since 1996 as neighbouring and regional authorities, and England as a whole. This trend has been largely stable for the past 10 years. (EP20, figures 11 and 12)
- house price inflation follows the national trend, but shows post-recession recovery in recent years. (figure 13)
- Mid Sussex has below average house price appreciation compared with regional, county and national averages. (figure 14)
- the proportion of new households unable to purchase or rent without assistance in Mid Sussex is generally more favourable compared with the other authorities in the HMA. This is based on three separate studies – the West Sussex SHMA (EP24, 2009), SHMA Update (EP25, 2012) and Northern West Sussex Affordable Housing Needs Update (EP26, 2012) updated over time. (figure 17)
- whilst the affordability ratio for Mid Sussex has increased from just over 4:1 in 1997 to just over 10:1 in 2013, this ratio has seen only minor fluctuations since 2004 – a time period that includes the recession. This is more reflective of the housing market in general as opposed to anything specific to Mid Sussex (analysis of comparative authorities shows this). (figure 18)
- this time period also includes an under-provision of housing against the South East Plan target (albeit this target was not reflective of ‘housing need’ – see question 7.1) however the evidence in Figure 18 does not suggest that this under-provision has significantly affected market housing affordability, which has remained broadly constant in recent years
- the South East, West Sussex and comparative authority’s affordability ratios over time are largely equal. Most importantly, although there has been an increase in affordability ratio from 2003 onwards, the trend over this time has remained largely comparative to Crawley, Horsham and West Sussex in total. It largely tracks the trend shown across England as a whole. (figure 19)
- the level of private rental lettings are more favourable in Mid Sussex compared with other authorities in the HMA (Mid Sussex has seen a significant decrease over time). Rent as a % of mortgage cost is more favourable than Crawley and comparable to Horsham. (figure 20 and table 18)
- in terms of renting, there is a similar increase in median monthly rent between 2010-2014 for Mid Sussex and comparative authorities. The data does not suggest that Mid Sussex is in any worse-case than comparative authorities – data does not indicate that private rental costs in Mid Sussex can be isolated as under any significantly different pressure from market conditions than comparative areas. (Table 19)

2.2.7. The evidence on affordability demonstrates that Mid Sussex is not an isolated case, and largely reflects regional and national trends. Affordability is largely comparable with neighbouring Horsham district, which is within the same Housing Market Area. The Horsham Inspectors’ report (para 36) concludes that “absolute [house price] rises are similar to those seen in Mid Sussex” and that there is no strong case for a significant uplift to account for market signals in Horsham district which are very similar to those elsewhere across all of the south east. The Inspector concludes that “The Council’s modest increase is therefore appropriate”. In order to provide consistency across the primary HMA, the HEDNA Update and Addendum (EP21 and EP22) use the same methodology as Horsham to establish the appropriate ‘market signals’ uplift.

2.2.8. Other market signal indicators on overcrowding, concealed and sharing households, homelessness and numbers in temporary accommodation may demonstrate an unmet need for housing. The HEDNA analyses these signals in turn:

- Mid Sussex indicates a level of overcrowding equal or lower than most adjacent and nearby local authority areas (comparable to Horsham) which does not single out the area as uniquely stressed by the problem (Table 22)
- Overcrowding by tenure figures suggest Mid Sussex indicates among the lowest levels of overcrowding for the owner occupied sector and social rented sector (Table 23)
- Mid Sussex has one of the lowest levels of concealed households compared with adjacent and nearby local authority areas, also below the levels found in West Sussex, South East and National level (Table 24)
- Mid Sussex has had a consistently low level of homeless acceptances at an average rate well below West Sussex, South East and England as a whole (Table 25).

2.2.9. This analysis does not indicate market undersupply relative to demand. The HEDNA concludes that Mid Sussex is not an isolated case in a regional context, and does not demonstrate higher levels of, or disproportionate indicators of stress when compared to comparative areas (para 4.104).

2.2.10. The HEDNA, at the time it was written, suggested a 10% uplift would be reasonable and consistent with the principles of sustainable development – bearing in mind that the starting point OAN at that time was 570dpa, compared with 714dpa now calculated. This was seen as a ‘precautionary approach’ as the market signals data was not conclusive of a particular problem with affordability in Mid Sussex in comparison to adjacent and nearby authorities. The 10% uplift is an arbitrary figure based on two example Inspector’s reports (Uttlesford and Eastleigh) that were published just before the HEDNA was written. At this time, these were possibly the only two examples of an uplift that had been applied and found sound through the Local Plan examination process.

2.2.11. Since the HEDNA was produced, and prior to the Focused Amendments consultation, the HEDNA Update (EP21) was published. Since the original HEDNA, more examples of Inspectors’ reports had been published, including a number of examples where no uplift was applied or justified. In particular, more local examples (i.e. in the South East region at Arun and Chichester) and neighbouring Horsham and Crawley were identified. It was considered prudent to factor these findings in to the Market Signals analysis as they related directly to the data already gathered (in most cases, from the same source), allowed consistency across the region and most importantly used the same methodology as the two authorities in the primary HMA to ensure that the OANs could be compared on a like-for-like basis.

2.2.12. This has led to the uplift of 24dpa. This is considered an appropriate and reasonable uplift considering the evidence does not point towards severely worsening affordability, the situation in Mid Sussex is reflective of the region, and higher rates (suggested by representors) would not be in accordance with sustainable development.

2.3 Do the calculations adequately reflect projected jobs growth?

The OAN calculations adequately reflect projected jobs growth as the methodology for calculating this already takes into account expected demographic change in the District. Any apparent differences between jobs growth and labour force growth supported by the proposed housing provision reflects that Mid Sussex is part of a complex wider functional labour market rather than one in which population, households and job growth are perfectly aligned.

In practice, Mid Sussex sits between major employment centres such as London, Crawley-Gatwick and Brighton, and both exports its workforce to surrounding districts and London and imports labour from surrounding districts. These relationships with surrounding districts and London are well established and historic analysis suggests that the size of the Mid Sussex labour force has not been directly or perfectly influenced by past population and household growth, or vice versa. Mid Sussex aims to increase its economic base and employment levels but judges that the main effect of this will be to reduce the need for longer distance out commuting.

- 2.3.1. Mid Sussex, Crawley and Horsham Councils commissioned a Housing Market Area-wide Economic Growth Assessment (EGA), published April 2014 (EP35). This was based on Experian economic growth forecasts, which established a baseline prediction of the creation of 10,425 additional jobs in Mid Sussex between 2011-2031, equivalent to **521** jobs per annum. This was considered by the Council to be optimistic given recent trends in job reduction over the period 1997-2013 (the HEDNA provides analysis of this projection – EP20, paras 5.77-5.81).
- 2.3.2. The Burgess Hill Employment Sites Study (BHESS) published in March 2015 (EP36) updated the District-wide job forecast was based on more up-to-date Experian data. This suggested an equivalent of **491** jobs per annum for the Plan period (2014-2031).
- 2.3.3. The jobs forecast, based on economic trends, is therefore within the range of 491-521 jobs per annum, with the lower end representing the most up-to-date data. A number of representors object to the use of Full Time Equivalent (FTE) jobs – whilst this figure is presented in the EGA, BHESS and HEDNAs, it is the workforce jobs figure that the Council is using for this exercise.
- 2.3.4. There are some important factors to note about the Experian job growth projections:
 - They use population/household projections as a component. Therefore, there is potential for ‘double-counting’ should more housing be provided to meet job forecasts, as this will in turn increase the job target – this vicious cycle, or “self-defeating prophecy” is outlined in PAS guidance (“Objectively Assessed Need and Housing Targets, June 2015) and presented in the HEDNA Update (EP21, Figure 2).
 - The job growth projections are for the total jobs in Mid Sussex, regardless of whether they are filled by someone living in Mid Sussex or commuting from outside the District.
- 2.3.5. The HEDNA, HEDNA Update and HEDNA Addendum present the ‘need’ for additional workforce jobs as a result of household growth based on modelling outputs from POPGROUP. The number of workforce jobs is estimated by:
 - Utilising the most up-to-date sub-national population projections
 - Establishing the economic activity rate for each age group, based on Census/Business Register Employment Survey/Office of Budget Responsibility data
 - Establishing how many people, for any year and age group of the projection, are likely to be economically active (i.e. in work or seeking work) based on (1) and (2). This is the total likely workforce (regardless of where they are employed).
 - Factoring in commuting ratios and employment/unemployment ratios. This is the total likely workforce jobs i.e. the number of jobs within Mid Sussex.

- 2.3.6. The HEDNA Addendum calculated that a proposed District Plan provision of 800dpa would lead to job growth of **370** workforce jobs per annum (EP22, Table 9). This is the number of additional workforce jobs being supplied as a result of household growth. Since the HEDNA Addendum was published, a further quarter of data referring to employment/unemployment rate and commuting ratios has been published (Annual Population Survey) and the POPGROUP modelling updated – this now suggests a figure of 446 workforce jobs per annum based on household growth of 800dpa. The volatility in figures over a short timespan emphasises the sensitivity in job growth modelling components.
- 2.3.7. The Council is aware that the job growth ‘supply’ figure of 370 in the District Plan (now potentially 446) is below the 491-521 jobs per annum Experian forecasts. However, this does not necessarily mean that these job forecasts are not going to be met, and does not necessarily warrant an increase in housing supply in order to meet them:
- The 491-521 job forecasts relate to total jobs forecast in Mid Sussex regardless of whether they are filled by someone living in Mid Sussex or commuting from outside the District, whereas the supply figures of 370-446 relate to Mid Sussex residents living and working within the District.
 - Jobs forecasts by Experian already factor in demographic issues such as ageing workforce.
 - The jobs forecasts figures could be met if the number of people out-commuting from Mid Sussex decreases i.e. people currently out-commuting for work decide to work within Mid Sussex. For context, Census 2011 showed a higher ‘live/work’ percentage (i.e. those who live and work in Mid Sussex) than Census 2001- 54% compared with 56%. Data between the two Census’ show an increase in those working from home (2001: 10.7%, 2011: 13.3%) and with improvements in technology, this is expected to continue.
 - Policies within the District Plan (in particular DP2) encourage employment growth including the identification of 30ha of high quality employment land at Burgess Hill. One of the objectives of this allocation is to decrease the distances people have to travel for work, as well as providing employment space to meet the need arising from household growth.
- 2.3.8. Based on the above, to suggest an increase in housing supply as a solution to meet the job forecasts is an inefficient tool for increasing workforce to meet projections. It implies that the jobs forecasts can only be met by the supply of new Mid Sussex residents through household growth as opposed to increasing Mid Sussex workforce by reducing out-commuting by existing residents. It also implies that job growth forecasts should not be met by in-commuters – given the unmet need for employment land in Brighton & Hove and Crawley, it has to be assumed that some of their workforce will in-commute to Mid Sussex should suitable jobs arise there.

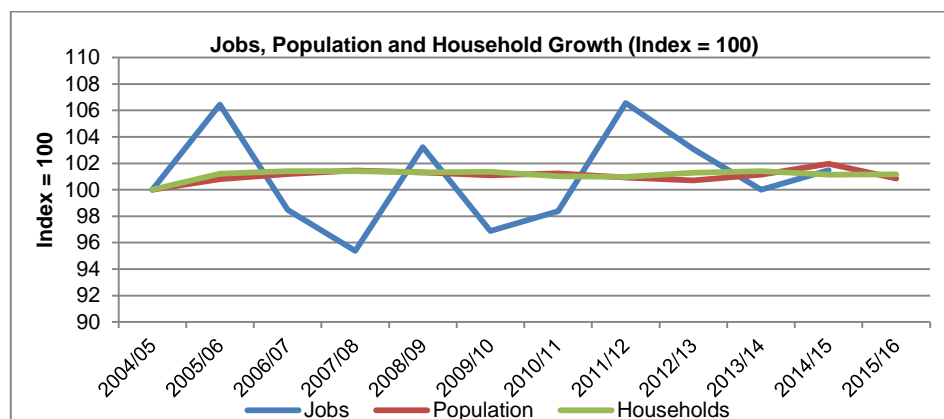
Trends in Jobs, Population and Household Growth

Figure 2 - Jobs, Population and Household Growth (Source: Annual Population Survey/ONS Mid-Year Estimates/CLG 2014-based Household Projections)

- 2.3.9. Job growth has been at a level between -5% and +5% per annum between 2004/5 and 2015/16, with population/household growth between 1-2% per annum. The levels of job loss (albeit at low levels) have been in the years entering and emerging from the recession. However, growth levels have generally been at a higher rate than that of population or household. This does not demonstrate a need to adjust the OAN in order to stimulate jobs growth. Mid Sussex also has a very low level of unemployment (less than 3% of those economically active are unemployed compared with around 5% nationally).
- 2.3.10. The HEDNA (EP20, paras 6.19 – 6.20) explains that the number of people of working age will increase over the plan period. As a percentage of total population, this is a decrease, however providing more housing does not make a significant difference on this measure – as shown in Figure 44, an increase in over 300dpa makes only a 1% increase in working age population. This too does not demonstrate a need to adjust the OAN to stimulate jobs growth.

3. The Duty to Co-operate

3.1 Can it be demonstrated that active co-operation has taken place on strategic cross boundary issues, especially in respect of the assessment of wider and unmet housing need?

Mid Sussex District Council is confident that it has met the duty to co-operate on strategic cross boundary issues. The Duty to Co-operate Statement (BP17) sets out the work that the District Council has undertaken alongside the preparation of the Mid Sussex District Plan 2014-2031, in particular work between 2014-2016. To support this work, Memorandums of Understanding, Statements of Common Ground and joint evidence with neighbouring authorities have been produced. Work on the duty to co-operate has included various matters including housing, employment, gypsy and traveller provision, nature conservation, landscape and infrastructure.

This Council has actively engaged at all levels with our neighbours in particular Crawley and Brighton & Hove. This engagement has taken many forms such as, ongoing dialogue with planning officers and senior officers including the Chief Executive. This involves conversations in the lead up to the examination to discuss developer involvement and representation at the Examination. The main outcome of these discussions has been the

provision of 782 dwellings (46dpa) to assist with the unmet need of neighbouring authorities.

- 3.1.1. In respect of the assessment of wider and unmet housing need, Mid Sussex has given consideration to helping neighbouring authorities meet their unmet housing and a study was undertaken to understand the capacity of Mid Sussex to accommodate further development (BP47). A further study was undertaken to assess the sustainability impacts of any requests for Mid Sussex to accommodate the unmet needs of other local authorities (EP14).
- 3.1.2. For analysis and research purposes, Mid Sussex has always been treated within the wider area as a member of the North West Sussex Housing Market Area (NWS HMA) as its primary HMA and as a functionally linked neighbour to the Coastal West Sussex Housing Market (CWS HMA) (MSDC1)
- 3.1.3. Mid Sussex has maintained a constructive dialogue with neighbouring authorities particularly Crawley Borough Council and Brighton & Hove City Council. The detailed duty to co-operate work with neighbours has demonstrated that whilst the Mid Sussex District Plan can make a contribution to the unmet needs of neighbours, it cannot be responsible for resolving all the unmet needs to the housing market areas. Mid Sussex has not received any realistic or firm indication of how many dwellings might be required in Mid Sussex to fulfil the unmet needs of its surrounding authorities. It was agreed in discussions that Mid Sussex lacks suitable sites to enable it to deliver sustainably more unmet needs at the present time.
- 3.1.4. The figure of 105dpa set aside for unmet need in the Focused Amendments version of the District Plan has reduced following the release of the DCLG 2014 data. Both Crawley and Brighton & Hove, based on the most up-to-date evidence, have agreed that the figure would reduce to 46dpa as Mid Sussex housing need has increased, while the delivery of a sustainable supply of housing sites has not. The most recent e-mail correspondence (BP17, Appendix 7) from Crawley Borough Council and Brighton & Hove City Council (August 2016) states that whilst the reduction in the amount of surplus housing available from Mid Sussex to assist with the shortfall is regrettable the reasons underpinning it are noted. The City Council considers this approach to be acceptable and looks forward to continuing to work with Mid Sussex.
- 3.1.5. The outcomes of these discussions are reflected in the signed Memorandums of Understanding with neighbouring authorities. These are included within the Duty to Co-Operate Statement (BP17), alongside details of meetings held between Mid Sussex and other authorities to discuss strategic issues and potential outcomes. To better present this information, the Council is preparing a comprehensive table of relevant meetings which will be published in the next few days.
- 3.1.6. The duty to co-operate has also been demonstrated through the representations received to consultations on the District Plan¹. For example, the following table highlights some of the responses received from neighbouring authorities during the consultation on the Focused Amendments to the Pre-Submission Draft District Plan (November 2015 – January 2016).

¹ See BP11, BP12, BP13 and BP14 – copies and summaries of representations.

Respondent Number	Local Authority	Comment
82	Adur and Worthing Councils	Adur District Council, Worthing Borough Council and Mid Sussex District Council have been working together through a number of mechanisms to meet the requirements of the duty to co-operate and address cross-boundary matters.
84	Arun District Council	Arun District Council is content that Mid Sussex District Council has continued to engage constructively, actively and on an ongoing basis on strategic matters.
87	Brighton & Hove City Council	It is noted that amendments have been made to paragraph 3.38 of the Pre- Submission Draft of the District Plan on Duty to Cooperate. Some of these reflect the suggested amendments requested by the city council in July 2015.
99	Crawley Borough Council	CBC welcomes the recognition in the District Plan, through the Focused Amendments in paragraph 3.18, that this increased figure allows for Mid Sussex to contribute towards meeting neighbouring authorities' housing needs, and the emphasis on the additional dwellings meeting the unmet needs from within the Northern West Sussex housing market area, principally highlighting Crawley's unmet needs.
119	Horsham District Council	Horsham District Council confirm that the two authorities have planned for cross-boundary implications on an ongoing basis through our regular duty to co-operate meetings during the preparation of our Plans.

Table 5 - Duty to Co-Operate

4. Unmet need

4.1 What factors should determine the amount of provision that should be made in Mid Sussex to accommodate the unmet needs of other authorities, notably Brighton and Hove, and Crawley?

Given the constraints within the District and the finite pool of suitable/available/achievable sites, the amount of Housing that Mid Sussex can deliver is challenging as evidenced by the Sustainability Appraisal and Cross Boundary Options Assessment. Provision of a higher number would be unsound and unsustainable.

The Council consider the following to be the key factors when determining the provision that should be made to accommodate unmet needs of other authorities:

- Sustainable capacity
- Deliverable capacity
- Linkages with authorities and 'reasonableness' of receiving unmet need
- Location of potential sites and their effectiveness/likelihood of being an alternative, should demand not be met in the original authority area

- **Totality of unmet need and extent that Mid Sussex can contribute**
- **Requests from neighbouring authorities**

- 4.1.1. Firstly, the capacity of the District to sustainably accommodate any unmet needs should be established. Extensive work was undertaken within the Sustainability Assessment of Cross-Boundary Options (EP14) study, which assessed the sustainability merits of meeting none, some or all of each neighbour's unmet needs in turn as well as the total unmet need from the area.
- 4.1.2. This cross-boundary assessment concluded (EP14, section 6) that the greater the housing required the more likely significant adverse effects would occur with respect to environmental objectives. Significant positive effects would likely arise for social objectives. Providing additional development in excess of that required by Mid Sussex to meet its own need would not be without its challenges, due to constraints identified within the Capacity Study (EP47). The findings from both studies were incorporated into the Sustainability Appraisal (BP5, 7.77-7.83 and subsequent appraisals).
- 4.1.3. The Sustainability Appraisal (BP5, pages 87-94) appraises housing provision options ranging between 700-1000dpa and undertakes an exercise (paras 7.89-7.133) in striking the balance between potentially significant positive social/economic impacts and significant negative environmental impacts. In effect, as the District's OAN can be met by all options over 754dpa, the housing provision options appraised represent the extent to which Mid Sussex can sustainably assist with meeting the unmet need of neighbours.
- 4.1.4. The overall capacity of the District to assist further with meeting unmet need is relevant. There is only a finite supply of suitable/available/achievable sites within the SHLAA (EP27) – currently totalling 12,596 units of which the majority will be required to be developed in order to meet the provision of 800dpa. Therefore, in order to accommodate further unmet need, potentially unsuitable/unsustainable sites would be required. The Capacity Study showed that almost 2/3 of the District is covered by a 'Primary' constraint (i.e. those identified within the NPPF as having the highest protection such as National Park or AONB), and only 4% of the District is not covered by a primary constraint, one or more secondary constraints (i.e. those that are sensitive but have less weight than primary constraints) or already built on.
- 4.1.5. These factors have been discussed regularly with neighbouring and nearby authorities. A series of meetings were held to present the findings of the Capacity Study and the Sustainability Assessment of Cross-Boundary Options with neighbours prior to their publication to discuss the constraints to assisting with meeting unmet need. Drafts of the Sustainability Assessment were circulated for comment ahead of preparing the final draft. Neighbouring authorities supported the principle of this work and broadly agreed to the findings. The various Memoranda of Understanding (BP17, Appendix 2) between all neighbouring and nearby authorities confirms this position.
- 4.1.6. The conclusion of the Sustainability Assessment and the District Plan Sustainability Appraisal (BP5, Table 29) is that the strongest linkages are with Brighton & Hove and Crawley, based on migration, commuting and the level of unmet need arising from these areas. Linkages with other authorities, particularly those along the coast, are weaker and making provision to meet their unmet needs would not be considered sustainable development.
- 4.1.7. The Sustainability Appraisal (para 7.137 – 7.140) appraises the likely broad locations for strategic development, taking into account the potential to meet unmet need from neighbours. The appraisal identifies the areas around the three main towns (Burgess Hill, East Grinstead and Haywards Heath) and south of Crawley as the most sustainable broad locations. The allocations at Burgess Hill (DP9, Northern Arc) and Pease Pottage (DP9a,

Hardriding Farm) are most likely to be able to provide housing adjacent/nearby Brighton and Crawley respectively.

- 4.1.8. The Council, through duty to co-operate discussions, is fully aware of the unmet need of neighbouring authorities. The cross-boundary assessment established (at the time of its writing) an unmet need of 37,773 dwellings (2011-2031). As at September 2016, the total estimated unmet need has risen to 38,558 – however the unmet need within the District Plan period (2014-2031) is 34,863. Note that this is an estimate based on latest publications and discussions, as some authorities have not yet established their OAN through the examination process or settled on a supply figure.

Authority	Plan Period	OAN Total	Provision Total	Unmet Need	Notes
Adur	2011-2031	5,820	3,609	2,211	Proposed Submission (March 2016)
Brighton & Hove	2010-2030	30,120	13,200	16,920	Adopted Plan
Crawley	2015-2030	10,125	5,100	5,025	Adopted Plan
Horsham	2011-2031	13,000	16,000	-3,000	Adopted Plan
Lewes	2010-2030	10,400	6,900	3,500	Adopted Plan
Mid Sussex	2014-2031	12,818	13,600	-782	
Tandridge	2013-2033	9,440	2,336	7,104	Early draft (SHMA 2015). Provision ranges from 2,336-10,128 in consultation draft
Wealden	2013-2033	14,700	14,700	0	Issues and Options (Nov 2015)- maximum figures of the range used as 'worst case'
Worthing	2013-2033	12,720	5,140	12,720	Issues and Options (May 2016) - no provision figure set, so average completions over last 10 years used.
TOTAL		119,143	80,585	38,558	

Table 6 - Unmet Need: as at September 2016

- 4.1.9. It is clearly not sustainable or feasible for Mid Sussex to accommodate this entire figure by virtue of being one of the last authorities to publish a sound District Plan in the area. A number of representors comment that Mid Sussex should pick up the shortfall for the Northern West Sussex Housing Market Area, as Crawley and Horsham have sound plans with agreed provision figures– the Council agree with the findings of both authorities' Local Plan examinations, and do not debate the provision figures that are settled upon, but it is not correct of representors to assume that Mid Sussex is able to meet the shortfall by virtue of being the last plan to be adopted – analysis of constraints and capacity within Mid Sussex should be considered foremost and on its own merits.
- 4.1.10. No neighbouring authority indicated that Mid Sussex should meet their entire unmet need, nor have any specific, calculated requests for smaller amounts been made. However, the Council understand the issue and the social/economic benefits of ensuring sufficient housing supply, and are prepared to assist where it is sustainable to do so (i.e. in accordance the “positively prepared” test of soundness at paragraph 182 of the NPPF).
- 4.1.11. Given constraints within the District, and the finite suitable/available/achievable supply of sites, the assistance that Mid Sussex is offering to meet unmet housing need should not be under-estimated. Providing a higher amount would be unsound and unsustainable, as evidenced in the Sustainability Appraisal, and there are major challenges as to how deliverable a higher housing number would be (see responses to questions 6 and 8).
- 4.1.12. Having regard to the NPPF (para 182) it would not be reasonable and consistent with the principles of sustainable development to consider higher housing provision to unmet need, and would therefore fail the “positively prepared” test of soundness. Deliverability could not be demonstrated, meaning the District Plan would not be effective or justified.

4.2 What calculations have taken place on a cross-boundary basis to arrive at that provision?

The provision for unmet needs has taken the District's sustainable and deliverable capacity into account whilst considering the extent of unmet need arising from neighbouring authorities. It is difficult to robustly determine a precise figure of unmet need that the Council could or should provide for given the complexities regarding housing market areas and linkages between authorities.

Following advice from PINS, the Council wrote to neighbouring authorities requesting them to set out their OAN and housing provision, to best understand where unmet need was arising. The Sustainability Assessment of Cross-Boundary Options used this information to appraise a range of scenarios, however it would not be possible (in sustainability and/or supply terms) for Mid Sussex to reach these levels given its own constraints. In addition to meeting its own housing need, the Council is proposing a total of 782 dwellings (46dpa) over the plan period for unmet needs. This provision represents the amount that is demonstrated to be sustainable and deliverable – in accordance with the NPPF.

- 4.2.1. As discussed in response to question 4.1, the extent of unmet need in this area is substantial (38,558 in total, of which 34,683 is within the Mid Sussex plan period 2014-2031).
- 4.2.2. The Sustainability Assessment of Cross-Boundary Options (EP14) set out a number of scenarios with respect to the amount Mid Sussex could contribute based on past commuting rates, past migration rates, meeting all unmet need or meeting none; both in regional totality and for each neighbouring authority in turn.
- 4.2.3. Whilst theoretically a level of unmet need for Mid Sussex to accommodate could be calculated using this approach, practically and sustainably these levels could not be delivered on the ground. The calculated approach within the Cross-Boundary assessment identified levels that could not be accommodated within Mid Sussex. For instance, meeting the lowest level of Brighton & Hove's (2,200) and Crawley's (1,240) need based on historic migration (around 25% of their total unmet need), would be an increase of 3,440 dwellings; in excess of 200dpa in addition to meeting the District's OAN. Other scenarios presented much higher figures. It is notable that no representors have set out a 'calculated' level of provision – simply suggesting meeting the 'residual' unmet need, doubling the allowance suggested (at the time 105dpa), or rounding to the nearest 100 dwellings/x% - the latter options are arbitrary amounts.
- 4.2.4. The accepted approach to determining the plan provision number is:
- Establish the Objectively Assessed Need
 - Determine whether this can be met, after undertaking an analysis of deliverable and sustainable capacity.
- 4.2.5. This exercise has been undertaken by all neighbouring authorities, with the majority indicating they cannot meet their OAN due to constraints (either environmental or capacity related). This has been confirmed through examination and adoption of 'sound' plans at nearly all neighbouring authorities. The exception to this is Horsham who are providing in excess of their OAN.
- 4.2.6. The Council has undertaken the same exercise - establishing the unconstrained OAN through the HEDNA documents, and assessing deliverable and sustainable capacity through the Capacity Study (EP47), SHLAA (EP27), Strategic Site Selection Paper (EP23), Sustainability Assessment of Cross-Boundary Options (EP14), and District Plan Sustainability Appraisal (BP5).

- 4.2.7. For Mid Sussex the OAN of 754dpa (as set out in the HEDNA Addendum, EP22) can be met and there is sustainable and deliverable excess capacity to assist meeting unmet need. However, there is a point whereby provision of further housing supply would cease to be sustainable or deliverable – this has been referred to as the ‘tipping point’ or ‘environmental capacity’ and is discussed further at question 8.2.
- 4.2.8. Paragraph 182 of the NPPF states that “the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development”.
- 4.2.9. The Sustainability Assessment of Cross-Boundary Options and District Plan Sustainability Appraisal both show that it would not be reasonable for Mid Sussex to accommodate unmet need of (for example) Arun or Chichester Districts, where there are weak links in terms of migration and commuting. It would not be sensible to expect that someone falling into need in those areas would likely have their need satisfied within Mid Sussex, plus this could lead to unsustainable commuting levels. To a similar degree, the draw and demand of living in Brighton is very different to most areas within Mid Sussex District, and it would not be reasonable to suggest that someone wanting to live in Brighton would be satisfied by the housing offer in the north of Mid Sussex in particular.
- 4.2.10. In terms of sustainability and capacity to assist, it is logical that the same environmental capacity/tipping point exercise undertaken by neighbours to demonstrate that they cannot meet OAN could be applied in Mid Sussex to determine its own capacity. The difference between sustainable/deliverable capacity and OAN is the amount to which Mid Sussex can assist with meeting unmet need.
- 4.2.11. The HEDNA Update (EP21) demonstrated an OAN of 695dpa, after taking into account vacancies and market signals. The Sustainability Appraisal (BP5, 7.89-7.133) demonstrated that 800dpa was the ‘tipping point’ by which negative environmental effects would not be outweighed by positive social/economic effects likely to arise from higher figures. This therefore would allow for 105dpa to be offered to neighbours, and this was agreed within the various MOUs (BP17).
- 4.2.12. Following the release of new increased household projections (CLG 2014), the HEDNA Addendum revised the OAN to 754dpa (accounting for vacancies and market signals). The Council reacted positively to this new evidence and amended the OAN accordingly. Given that the evidence base had already established that the provision of 800dpa was sustainable and deliverable, this revised the amount that could be offered to meet neighbours needs to 46dpa – 782 units over the plan period. Once this figure was known, the Council met with representatives of Brighton & Hove and Crawley Councils to explain the new evidence and its implications. The Duty to Co-Operate Statement (BP17, appendix 7) documents this and neighbours acknowledgement of the situation.

5. Affordable Housing

5.1 Will the housing requirement be sufficient to ensure that the District's affordable housing needs are met?

The Council's affordable housing provision is 30% (see the submitted plan (BP2)) on the assumption of provision of 800 dwellings per annum. This provides for up to 240 dwellings per annum.

The Council has a possible proposed modification to policy DP29 which would increase this provision to 40%, equivalent to up to 320 dwellings per annum to reflect starter homes. However, as noted in Chris Tunnell's letter of 29 September 2016 to the Inspector it is suggested that this latter policy is held in abeyance or treated as withdrawn, until such time as the Government's policy on starter homes is clearer.

The latest evidence in the 2016 HEDNA suggests an overall affordable housing requirement of between 191 and 294 dwellings per annum the former is based on housing those in 'reasonable preference' (i.e. in the most acute need) and the latter is based on housing all those on the housing register. Clearly even at 30% the Council is able to house those most in need.

Affordable Housing Need

- 5.1.1. An assessment of affordable housing need was undertaken by the 2009 Northern West Sussex SHMA (EP24) in accordance with the cancelled 2007 CLG SHMA Practice Guidance. This utilised the South East Plan target of 855dpa and estimated a range of need 357 (those in reasonable preference groups) to 477 (the full housing register).
- 5.1.2. The 2014 Northern West Sussex Affordable Housing Needs Update (EP26) provided a focused update to the SHMA which included an assessment of the level of affordable housing need in accordance with NPPG – Housing and Economic Development Needs Assessment.
- 5.1.3. Like the 2009 SHMA, the 2014 Update assessed affordable housing needs against those in reasonable preference groups and against the full housing register. The assessment accounts for those on the housing register, and also those unable to buy or rent privately without assistance by making allowance for households falling into need (calculated at 44.2%). It utilised two methods as a basis for new household formation to generate four scenarios, A to D. Scenarios A&C used a 'starting point' OAN based on 2011 CLG Household Projection because at the time the Council had not made any adjustment to the OAN or set a Plan requirement. Scenarios B&D used the same projection as a sense check based on the cancelled SHMA Practice Guidance which suggested a variant that restricts the formation of new households to those in the 16-44 years age cohort.
- 5.1.4. Whilst the cancelled SHMA Practice Guidance approach does not prescribe a specific method as a basis for new household formation specific scenario to use, it is considered in limiting household formation to those aged 16-44 years presents an artificially high household formation figure that is disproportionate to net household formation in comparison to household projections which are the starting point for identifying objectively assessed needs (see HEDNA Feb 2015 – EP20 paragraph 4.153 et seq.). As such, the Council consider only the methodology employed to generate scenarios A-C, later utilising adjusted OAN and a Plan requirement, as a basis to present a realistic picture of affordable housing need.

- 5.1.5. The Council therefore considers the methodology used to examine affordable housing need by the Strategic Housing Market Assessment Needs Model Update (2014) scenarios A&C; and subsequent updates to the model by the HEDNA (2015 and 2016) are robust and made in accordance with NPPG utilising relevant, referenced data sources.
- 5.1.6. Since 2014, the need assessment has been updated at various stages to reflect changing household formation estimates as a result of evolving CLG 'starting point OAN' Household Projections, Mid Sussex calculated OAN and the District Plan housing requirement (Table 7). The model has been updated where this has been possible with updates provided to the housing register and the committed stock of affordable housing.

Source	Affordable housing need measured against	'Low' estimate – reasonable preference groups	'High' estimate – waiting list
Affordable Housing Needs Model Update (2014) (Chilmark Consultants)	CLG Household Projection 2011 based 'starting point OAN' - (546)	116	223
HEDNA (Nov 2015) (MSDC)	CLG Household Projection 2012 based 'starting point OAN' - (656)	127	230
	Calculated OAN (695)	144	247
HEDNA Addendum (August 2016) (MSDC)	CLG Household Projection 2014 based 'starting point OAN' - (714)	153	256
	Calculated OAN (754)	170	254
	District Plan housing provision (800)	191	294

Table 7 - Affordable Housing Need Assessment 2014 - 2016

- 5.1.7. The HEDNA (2016) calculates the need for affordable housing using the Plan provision of 800dpa as the basis for household formation as this represents the most realistic approach to calculating affordable housing need. This not only accounts for the adjusted starting point OAN, but also the response to meet neighbouring authority housing needs. The affordable housing need is calculated as ranging from 191 to 294 households per annum (the lower figure includes only those in 'reasonable preference' categories on the housing register, whilst the higher figure reflects all those on the housing register). A breakdown of the calculation is included at Appendix 1.

Supply

- 5.1.8. The proposed policies will deliver up to 240 – 320 affordable homes per year at 800dpa.
- 5.1.9. The 30% as proposed will deliver 240 'traditional affordable housing'². The supply is sufficient to meet all those in reasonable preference groups (i.e. those in most acute need) on an annual basis (a net annual need of 191); and a significant amount (82%) of the total housing register (a net annual need of 294).

² Affordable rent and intermediate housing

Starter homes

- 5.1.10. The starter homes regulations consultation proposes a national minimum requirement of 20% of all homes to be delivered as starter homes on relevant residential sites. The Starter Homes Study (EP30) calculates that a 30% provision (2/3 starter homes) will assist in meeting 44 to 51 households per annum as many cannot afford to also purchase starter homes, and this would cause a significant shortfall in meeting the needs of those on the housing register and/ or are unable to buy on the open market. 30% provision (2/3 starter homes) would therefore only meet the needs of 57% of those in reasonable preference groups, and 32% of the needs of those on the waiting list for affordable housing.
- 5.1.11. The Addendum concludes that an upward revision to an overall provision target to 40% (half starter homes and half 'traditional affordable housing'), would better meet affordable housing needs. 40% would meet all those in reasonable preference groups on an annual basis and (64%) of the total housing register.

Viability Evidence

- 5.1.12. Viability evidence (EP43) demonstrates that 30% or 40% could be implemented without causing harm to development viability.

Response to representations

- 5.1.13. Representations suggest that the policy as worded is inflexible where sites cannot deliver full provision on grounds of viability or due to on-site constraints. The Council disagrees. The policy is not intended to render development unviable and harm the delivery of housing and allows variance in provision where justifiable. The appropriateness of the housing tenure (shared ownership or rented) will also be assessed for each site. A Developer Contributions and Development Viability SPD is proposed to be consulted upon following adoption of the District Plan and will set out more detail to the Council's approach to affordable housing provision.
- 5.1.14. Representations also suggest that an upward adjustment to the OAN / District Plan housing requirement is an appropriate response to increase the overall supply of affordable housing to meet needs. Whilst the Council's position is that a higher housing provision is unsustainable, it is considered that affordable housing need cannot be an outright driver or starting point in calculating housing provision. As stated in the HEDNA (November 2015 – EP21), the OAN is based on demographic projections and cannot differentiate between the market and affordable sectors and for reasons of double counting cannot be a sum of affordable needs plus market demand. It is part of the overall OAN figures, not in addition to it.
- 5.1.15. In any case, any increase to plan provision must be tested through the affordable housing needs model to take into account the proportion of those households that would be unable to buy or rent, the number of existing households falling into need and the supply of affordable housing (committed stock and churn of existing stock).
- 5.1.16. Testing indicates that an increase to the overall plan provision is an ineffective response to meeting the needs of those on the housing register and/ or are unable to buy on the open market because with any increase to overall housing levels, there are increased levels of affordable housing need. The HEDNA (November 2015) (EP21) states this is due to the proportion of households unable to rent or buy on the open market, which at 44.2%, is greater than any proposed policy provision of affordable housing and the annual supply of affordable housing. This is demonstrated in Tables 8 and 9 below.

AH Policy Req.	Plan provision	Potential supply of affordable housing at 30%	'Low' estimate – reasonable preference groups	'High' estimate – waiting list	% 'Low' estimate – reasonable preference groups needs met	% 'High' estimate – waiting list needs met
30%	800	240	191	294	126%	82%
30%	900	270	235	338	115%	80%
30%	1,000	300	279	382	108%	79%

Table 8 - Affordable housing need at differing Plan provision at 30%

5.1.17. At 30% provision, an increase in the plan provision by up to 25% to 1,000 units/ annum provides the potential to increase the supply of affordable housing by 60 units/ annum. However, as overall affordable housing needs also increase, the percentage of affordable housing needs met for both reasonable preference groups and the overall housing register declines by 18% and 3% respectively.

AH Policy Req.	Total Planned Housing (DPA)	'Low' estimate – reasonable preference groups	'High' estimate – waiting list	Total AH Supply	SH Supply Delivered (20%)	Non-SH Affordable Housing Supply (20%)	Residual Affordable Housing Need ³	% 'Low' estimate – reasonable preference groups needs met	% 'High' estimate – waiting list needs met
40%	800	191	294	320	160	160	140 - 250	114%	64%
40%	900	235	338	360	180	180	184 - 294	98%	61%
40%	1,000	279	382	400	200	200	228 - 338	88%	59%

Table 9 - Affordable housing need at differing Plan provision at 40%

5.1.18. Table 3 (and Appendix 1) demonstrates a similar picture at 40% overall provision. Whilst an increase in the plan provision by up to 25% to 1,000 units/ annum, provides the potential to increase the supply of affordable housing by 80 units/ annum, the percentage of affordable housing needs met for both reasonable preference groups and the overall housing register declines by 26% and 5% respectively.

5.1.19. Such a response is therefore not an effective and proportionate response to better meet local needs and there are fundamentally no strong grounds for an uplift to the OAN/ plan provision on the account of better meeting affordable housing need alone.

5.1.20. The Council has received representation that it has under estimated the level of affordable housing need in the district with the under estimation focused on whether homeless households and those in temporary accommodation and overcrowded and concealed households are taken into account in the Council's assessment; and the use of gross household formation to calculate the figure.

5.1.21. The Council has taken homeless households and those in temporary accommodation and overcrowded and concealed households into account as these will be included on the housing register, although the picture is slightly less certain with regard to whether all overcrowded and concealed households will register with a local authority. Nevertheless, to add such figures, obtained from the 2011 Census, as a source of need into the affordable housing need model would undoubtedly introduce double-counting. It should however be noted that both 30% and 40% provide a level of affordable housing which exceeds the reasonable preference requirement by some margin, and there is a significant buffer on meeting the reasonable preference groups that will also likely meet the needs of any overcrowded or concealed households not registered with the local authority. Provision

³ HEDNA need (low - high estimate minus 44 - 51 households potentially met by SH provision)

would also meet a significant proportion of the entire housing register need. On this final point, it should be noted that the Mid Sussex housing register includes a significant amount of Band D applicants (75%) which are those deemed to have low or no affordable housing need.

- 5.1.22. With regard to the use of gross household formation, this matter is considered in the HEDNA (February 2015 – EP21). This concludes that utilising a CLG Household projection methodology is considered to provide a much more realistic estimate as it accounts for changing household circumstances, migratory pressures, and dissolution of households. On this basis, only the outputs of the affordable housing needs model, presented as Scenarios A and C in the 2014 Affordable Housing Needs Model should be considered. This same methodology alongside calculating the needs arising from the District Plan housing provision has been used to update the figures since.
- 5.1.23. The Council's development strategy at the proposed level of provision at 800 homes a year represents a balanced approach in terms of affordable housing provision. It will meet all the assessed need when considering those in most acute need the 'reasonable preference groups'; and a good proportion of the entire housing register. It is clearly inappropriate to calculate the OAN on the basis of affordable housing needs as the affordable housing is part of the OAN and to then makes an adjustment to plan provision on the back of this. It is clear that increasing the policy provision of housing is not an appropriate reaction to better meet the needs of those in affordable housing need.

6. The ability of the market to deliver

6.1 Can the market deliver the housing requirement in the submitted District Plan? What would the implications of a higher housing requirement for market deliverability?

The Council has been ambitious in setting a housing target that is stretching given historical performance in housing delivery. The most recent data on completed dwellings (Appendix 6) shows that a delivery level of 800 dpa can be achieved by the market. There is, however, no evidence to suggest that a higher housing requirement could be sustained by the market, whether for practical reasons; or as ultimately delivery is within the control of developers, due to a desire to avoid the depressing effect on prices that would occur with over-supply.

- 6.1.1. Given recent improvements in the annual housing delivery rate, the Council considers that there is reasonable evidence that the market can deliver at 800 dpa (Figure 1). It is, however, important to note that the delivery of housing is ultimately within the purview of a limited number of the housing developers with long term land deals, which may, of course, allow them to exercise market power. There is also evidence that landowners are holding out for the best deals in a way which is challenging viability and affecting delivery, particularly in an uncertain and evolving policy environment. There are also doubts, expressed by house builders, about the availability of construction sector capacity to deliver schemes, principally due to skilled labour shortages.
- 6.1.2. The NPPF current policy stance in relation to the implications of not having a five year supply does not always provide a strong incentive for developers to bring forward more difficult schemes and it is considered this may have held back early delivery of much of the development north of Burgess Hill. So whilst the Council is confident that there are sufficient sites available and that a delivery of 800 dpa is practically achievable, in reality the market behaviour of housing developers and the capacity of wider construction sectors will have ultimate control in what is actually built.
- 6.1.3. Historically the build rate experienced at Mid Sussex is an average of 515 dwellings per year (for the period 2006-2016). The picture is improving with an average of 661 units over the past 5 years and over 800 delivered in 2015/16. In the recent past period while there has been a high stock of commitments, in excess of 4,000 for nine out of last ten years, and an upward trend of granting permissions to maintain the stock, this has not always be translated into delivery.
- 6.1.4. Since early 2011, a 'free for all' has been afforded to developers to bring forward sustainable development, and the Council has not contested the existence of a five-year housing land supply. It is this permissive environment that has probably been a contributing factor to a more competitive house building market and the recently increased delivery rate, although it is also reflected in a high level of appeals. With a plan in place the Council intends to monitor progress carefully and commence a site allocations document to ensure a plan led response to maintain a continued supply of smaller scale sites. Nevertheless, assuming that the market remains competitive, the Council considers a stretching housing requirement of 800 dpa as ambitious, but realistically achievable.
- 6.1.5. Increasing the housing requirement further would mean a need for another strategic allocation or the identification of a larger number of smaller sites. The Council is not aware of any additional deliverable sites of sufficient scale to deliver a meaningful increase in housing numbers and already requires a very high proportion of the stock of smaller sites, many of which are concentrated around the district's more limited settlements, to meet 800 dpa.

7. Past under-delivery

7.1 Should the housing requirement be adjusted to compensate for a degree of under-provision against the South East Plan prior to 2014?

The District Plan plans for the period 2014-2031 and uses the most up-to-date population and household projections. The South East Plan has been abolished, was based on (now) out of date data, and was a policy-led approach to distributing housing across the sub-region, as opposed to a measure of Objectively Assessed Need. The Council are strongly of the view that the OAN of 754dpa represents the most relevant measure of housing need. The HEDNA (EP20, paras 6.21-6.26) provides a commentary on backlog/under-supply against the South East Plan and justifies the Council's position to not make an adjustment.

7.1.1. The District Plan covers the period 2014-2031. Similarly, the calculation of Objectively Assessed Need covers the same period. Therefore, the District Plan is looking to address housing need arising throughout the plan period based on projected household growth and an allowance for neighbouring authorities.

7.1.2. The South East Plan Regional Spatial Strategy (SEP) was formally abolished in March 2013, alongside the housing requirement within it. There are valid reasons for not incorporating any under-provision within the District Plan housing requirement:

- The South East Plan was not a measure of housing need, instead it was a housing requirement based on redistributing projected growth from constrained areas.
- The South East Plan requirement was based on housing need for the region as a whole, not for individual authority areas, which was then redistributed to individual authorities
- As Government finalised the South East Plan there was a further late redistribution of housing numbers within the region from that recommended by the EiP Panel given the loss of the strategic growth allocation on the western side of Reading due to Environment Agency flood risk concerns. But at the same time the Government also decided on a region-wide uplift of 4% on housing numbers and Mid Sussex received an unsubstantiated uplift of 100dpa, (the same was also applied to Reigate and Banstead, and Dover). It is believed that at the time in making these allocations the Government Office were very exercised at the time about the implications of Special Protection Areas under the Habitats Directive and avoiding pressures in affected areas. However, in doing so, Government did not seem to be aware of the relationship of Mid Sussex to the Ashdown Forest. No formal explanation for these unfounded late changes were ever provided.
- The South East Plan was supported by a number of complementary policy measures including growth areas, growth points and infrastructure provision which was mostly not realised or were abandoned after the Coalition Government came to power in 2010 meaning that the implementation of the plan was only partially progressed.
- The requirement of 855dpa in the South East Plan should not, therefore, be seen as the 'OAN' for Mid Sussex as it is not a correct indicator of need. It is not objectively assessed, as it takes policy considerations into account (need from regional authorities that could not be met in their area was redistributed to those authorities seen as 'less constrained' by comparison).
- The HEDNA (EP20, table 40) shows the 'starting point' OAN (based on the CLG household projections published at the time the SEP was written) was in the region of 300-500dpa for the plan period of 2006-2026. For the period 2006-2014, this is 275-475dpa dependant on whether CLG 2004 or CLG 2006 projections are used.
- Average completions between 2006 and 2014 were 457dpa (EP20, table 21). This is broadly in accordance with the housing need at that time and it is therefore not conclusive that there is any unmet 'need' against the South East Plan requirement.

- 7.1.3. The then Secretary of State expressed caution (SEP – Secretary of State’s Proposed Changes, October 2008) regarding the Mid Sussex housing figure, noting that she was “mindful of the panel’s caution that the area may not be able to deliver much higher numbers” and despite improved performance in recent year, “new planning tools to manage delivery” would help – although these have not materialised. The South East Plan was also based on a strategic allocation at East Grinstead for 2,500 homes through an Area Action Plan, however transport and viability constraints showed this to be undeliverable, the developer consortium pulled out, and work on the Area Action Plan was stopped.
- 7.1.4. It is Mid Sussex’s firm view that any measure of under provision against the South East Plan would require a region wide assessment of delivery against the overall plan across the region and a longer period of implementation. Under or over delivery is normally based on 5-year or longer periods of delivery and annual provision figures represent an average of these periods, not an annual target. In practice, the South East Plan was in force for less than 5 years, in a period of deep recession.
- 7.1.5. As discussed in the response to question 2.2, the HEDNA analysis of market signals does not indicate abnormal levels of overcrowding or concealed households, two factors that would be clear should there have been levels of under-provision significantly below housing need. Under-provision against the SEP target does not demonstrate any effects on these indicators, which would be expected if housing need was unmet.
- 7.1.6. The Council has had regard to the PAS guidance on this matter (Objectively Assessed Need and Housing Targets – Technical Advice Note – July 2015) which highlights a High Court Judgment⁴ that states that plan makers should not add any ‘backlog’ where past housing development has under-delivered against earlier plans.

“...There was no methodological error in the way these competing estimates for the period 2011-2031 were drawn up by reason of the notional ‘shortfall’ in housing delivery between 2006 and 2011 by comparison with the average annual figure for additional housing indicated in the South East Plan... There was no reason whatever for a person in 2011 seeking to draw up a current estimate of population growth and housing requirements looking into the future from that date to 2031 and using up-to-date evidence to do so, to add on to the estimated figures any shortfall against what had been estimated to be needed in the first phase of the previously modelled period included in the South East Plan”

- 7.1.7. As the OAN within the District Plan is based on up-to-date data and follows the guidance within the PPG, it is the best estimate of housing need at this current time, incorporating past trends for the time prior to the plan period. The District Plan therefore plans for this level of housing need, and is not impacted by policy decisions (such as redistribution in the SEP).

⁴ Zurich Assurance Limited v Winchester City Council and South Downs National Park Authority, [2014] EWHC 758 (Admin) 18th March 2014)

8. Site selection and housing distribution

8.1 Are the methodologies described in the Strategic Site Selection Paper and the SHLAA sound?

The Council has paid close attention to the guidance for undertaking Strategic Housing Land Availability Assessments (SHLAAs) in the Planning Practice Guidance. A methodology was proposed, tested with representatives from the development industry, and a consistent approach used across all site assessments. Landscape consultants were also appointed to undertake a review of the Council's conclusions on landscape assessments. The Strategic Site Selection Paper is based on the findings of the SHLAA as well as the Sustainability Appraisal – itself prepared in accordance with the PPG guidance and Strategic Environmental Assessment regulations. It also considers the various tests set out in the NPPF regarding constraints and site selection.

- 8.1.1. The **Strategic Site Selection Paper** (SSSP, EP23) draws together information from the Sustainability Appraisal (BP5) and SHLAA (EP27) to provide a comprehensive assessment of strategic site options. It provides a tool for justifying site selection based on the relevant sustainability objectives in the Sustainability Appraisal and deliverability/viability factors in the SHLAA – recognising that none of these assessments on their own would provide a holistic view.
- 8.1.2. The SSSP has transparently set out the reasons for criteria selection (EP23 paras 1.28-1.34), identifying 15 criteria in total. This criteria represents the 'key' criteria for site assessment taking account of constraints, accessibility, deliverability and housing need in equal measure. These criteria are aligned with the tests of soundness:
- Positively Prepared – the housing need criteria ensure that the District's need and neighbouring authorities' unmet need are considerations in site selection.
 - Justified – all site options are considered against this methodology and the evidence base used to 'score' against each criteria
 - Effective – the deliverability criteria ensures that the site selected is deliverable over the plan period
 - Consistent with national policy – the constraints and accessibility criteria ensure that the most appropriate site in sustainability terms is chosen.
- 8.1.3. The Council are aware that the ranking of sites can lead to questions about the weighting given to different objectives and it is for this reason that the SA and SHLAA do not seek to rank sites in order of preference as neither study includes all the necessary information to provide an overall view. However the SSSP brings all site selection considerations together and ranks the sites – the approach to the weighting of objectives is discussed at paragraphs 1.37-1.41 of the SSSP.
- 8.1.4. The methodology for the **SHLAA** is based on the guidance set out in the PPG. The full methodology was updated in February 2015 and published on the Council's website within the Examination Document Library as part of Document EP27. A common methodology was agreed across the NWS HMA with Horsham and Crawley. A developer workshop was held on 13 January 2015, chaired by the former Chief Planning Inspector, Peter Burley. The purpose of the workshop was to enable developers and agents to feed into the process of preparing the SHLAA. In particular, views were sought on the methodology, typologies of sites, as well as discussion about the consistency of the Assessment. The agreed minutes have been published in Appendix 2 of the Main report of the SHLAA. There were no significant concerns raised by participants to this methodology.
- 8.1.5. The Council has considered the representors argument about the methodology used for developing the SHLAA in some detail and concludes that none merit any amendment to the

methodology. The SHLAA has been positively prepared in drawing conclusions on the ability of sites to accommodate development and contributes to the soundness of the Plan.

- 8.1.6. Representors have suggested that the Council could identify more deliverable sites in the SHLAA to accommodate more of the OAN, whilst acknowledging that some of these sites will be allocated through Neighbourhood Plans. It has also been suggested that the SHLAA should be reviewed to change assumptions made to identify sufficient land to meet the OAN.
- 8.1.7. The Council considers that the SHLAA identifies sufficient land to meet the OAN and some unmet needs of our neighbours. It concludes that there is a total supply of 12,596 units between April 2016 and 2031. This includes the supply of 3,206 units on sites that are not currently in the planning process. The SHLAA is a live document which is updated on an annual basis. Therefore, the total supply of sites is likely to change over the Plan period. as further information on sites becomes available during the SHLAA reviews and the preparation of the site allocations DPD.
- 8.1.8. Representors suggested that AONB's should not be excluded from assessment in the SHLAA. Of the 351 sites subject to full assessment in the SHLAA 66 are within the AONB, and of these 19 are considered to be developable.
- 8.1.9. The SHLAA has discounted a significant number of sites which has dictated the strategy in the Sustainability Appraisal and the OAN figure. The SHLAA has been prepared with consideration to the OAN and the Sustainability Appraisal. The limited amount of available sites in the SHLAA limits the ability of the District to accommodate development.
- 8.1.10. Representors have suggested that there is potential for 'double counting' Neighbourhood Plan allocations and existing commitments. A review and assessment of the sites coming forward through Neighbourhood Plans is set out in the Housing Implementation Plan (BP18). An update to this is provided in response to question 9.1. The Council is satisfied that there has been no double counting between sites allocated in Neighbourhood Plans and existing commitments. This is demonstrated in the Commitments list published in the Housing Implementation Plan.
- 8.1.11. Representors have suggested that the decision not to allocate all sites around settlements as this would not be sustainable, limits the maximum level of housing which could be delivered. It is the Councils view that SHLAA has considered all sites, around all settlements. However, it is reasonable to conclude that not all sites identified in the SHLAA as suitable should come forward for development.
- 8.1.12. The purpose of SHLAA is to identify a palette of possible sites that can come forward, there is no expectation that all sites in the SHLAA will be delivered. This is particularly the case when small villages have a number of suitable sites which if developed in combination would significantly change the character of the settlement. Mid Sussex is a rural district characterised by 3 large towns and many villages of varying sizes. Development should be appropriate to the scale of the existing settlement.
- 8.1.13. Representors have suggested that the exclusion of sites unrelated to the built up area needs to be reviewed. Sites are excluded from detailed assessment in the SHLAA if they are unrelated to existing settlement boundaries. It is not sustainable to develop numerous isolated sites that are not well related to existing services and alternative transport modes. Built up area boundaries are well established and Town and Parish Councils have had the opportunity to review them during the preparation of Neighbourhood Plans.

8.2 Is there any value in the concept of 'environmental capacity' and the 'tipping point' in the context of the whole district? Will the district's environmental constraints make the housing requirement undeliverable? What would the environmental implications be of raising the housing requirement? How far have the SHLAA and site selection methodologies taken into account the ability of development impacts to be mitigated through local landscape and infrastructure measures?

The 'environmental capacity' and 'tipping point' are important concepts in order to ascertain the most sustainable and developable capacity of the District. The two refer to the exercise undertaken by the Council, taking all factors into account and weighting them accordingly –the 'planning balance'. This exercise assesses Social, Economic and Environmental factors.

The Council propose a level of development, 800dpa, that will meet its own Objectively Assessed Need as well as assisting with unmet need from neighbouring authorities. This comes at environmental cost, however the benefits of doing so outweigh the negatives. The planning balance exercise, undertaken through the Sustainability Assessment of Cross-Boundary Options (EP14) and Sustainability Appraisal (BP5), conclude that environmental impact is likely to worsen with increased housing provision. This is particularly the case for sustainability objectives concerned with biodiversity, protection of the countryside, transport and water). Whilst positive social impacts are likely to occur with increased housing provision, these plateau and come at significantly greater environmental cost.

- 8.2.1. The Council intends the expression 'Tipping Point' to refer to the point at which a series of small effects become sufficiently significant to cause a larger, more important change in the overall sustainability balance. The 'Tipping Point' is the point at which, despite social/economic impacts becoming more positive as housing provision increases, these positive impacts are outweighed by negative impacts on environmental factors.
- 8.2.2. Bearing in mind the requirements of paragraphs 14 and 152 of the NPPF, a planning balance exercise was undertaken within the Sustainability Appraisal (BP5, paras 7.89-7.133) to determine the most sustainable housing provision option. This was assessed as being 800dpa. The 'Tipping Point' of 800dpa is not an absolute figure but a guide to where the balance of significant impacts or negative impacts worsen. It is not a development 'cap'.
- 8.2.3. The Tipping Point therefore represents the planning balance, weighting social, environmental and economic objectives, assessing likely impacts and therefore determining the most sustainable option for housing growth, based on available sites. It is a balanced and holistic view of the likely impacts on social, environmental and economic strands of sustainability and the range of provision where current options for housing growth move from being sustainable to unsustainable.
- 8.2.4. The Capacity Study (EP47) figure 4.1 shows the primary and secondary constraints to development are spread across the District, with particular constraints in the northern half due to the High Weald AONB, Ashdown Forest SPA/SAC, and expanse of ancient woodland. The southern half of the District is bordered by the South Downs National Park and is already receiving large-scale growth at Burgess Hill (with associated impacts on existing infrastructure). The 'tipping point'/environmental capacity applies to the District as a whole.
- 8.2.5. The Council's identification of a 'Tipping Point' or environmental capacity through the evidence base simulates the exercise undertaken by all neighbouring authorities with unmet housing i.e. identifying OAN and determining how much can be delivered based on constraints. The key difference with Mid Sussex is that the 'Tipping Point'/environmental

capacity is at a level above OAN, meaning the Council can offer a level of development towards meeting unmet needs of neighbours. This level is already at some environmental cost.

- 8.2.6. The provision of 800dpa involves substantial greenfield development and incursion into the AONB, it therefore has clear adverse effects even before higher provision figures are considered. It is considered that this level of provision is deliverable, as the SHLAA has identified sufficient suitable/available/achievable sites.
- 8.2.7. The Sustainability Appraisal sets out justification (p. 87 - 93) for 800dpa to be the 'Tipping Point'. The environmental implications (based on the Sustainability Appraisal) of raising the housing requirement further are summarised in Appendix 3.
- 8.2.8. For example, the Mid Sussex Transport Study (EP41) has tested development levels of 800dpa, and has flagged capacity issues and mitigation based on this level of development. Some areas of the District, in particular East Grinstead, suffer from existing transport capacity issues. Although this is not currently expected to worsen as a result of development proposed in the District Plan, further allocations of land or increases to housing provision risk increasing transport congestion. Similarly, increased development levels could increase the risk of pollution-related issues within the Ashdown Forest SAC/SPA.
- 8.2.9. The Sustainability Appraisal strikes the balance between environmental harm and social gains, in other words, it assess where adverse impacts would be significantly and demonstrably outweighed by benefits taking all factors into account. This exercise concludes (para 7.133) that in light of the full criteria, "key criteria" (i.e. those most related to the strategic objectives of the Plan), deliverability issues, and the tests in the NPPF relating to sustainable development, 800dpa is the preferred option.
- 8.2.10. The Council consider an increase to housing provision:
- Would require further identification of a strategic site(s) – the Strategic Site Selection Paper and SHLAA conclude that the only suitable/available/achievable strategic sites are the ones that are already allocated in the Plan. Other options considered and rejected are either constrained, unavailable at this time, not being promoted (therefore deliverability cannot be proven) or not in a sustainable location.
 - Would provide only marginal gains in social/economic terms. As the Council can meet its OAN, any increase in housing provision can only make a marginal contribution to the significant unmet needs of neighbours with significant environmental effect.
- 8.2.11. An increase to housing provision would compromise the unique and special character of the District for only marginal gains.
- 8.2.12. A representor has commented that the District Council has not informed them about what they need to submit to secure an assessment. Developers and planning agents should be fully aware of the information that they are required to demonstrate developability of a site in planning terms. Developers and planning agents need to input resources to demonstrate that constraints identified within the SHLAA can be overcome.
- 8.2.13. The PPG states that where constraints have been identified, the SHLAA should consider the action that would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Accordingly, the constraints and actions section of the SHLAA assessment sets out issues that need to be overcome for a site to become developable. The Council undertakes an annual call for sites when updating the SHLAA and this is an opportunity for the developers/landowners/agents to submit information to demonstrate that constraints can be overcome. The onus has to be on developers to submit sufficient material for the Council to

base its assessments on. The Council lacks resources to practically investigate constraints on all sites, or commission studies to determine issues such as access or flood risk or the viability of any required strategic transport upgrades. This means that the site assessments rely on the best information available.

- 8.2.14. The Council welcomes evidence from developers on how these constraints may be overcome and the SHLAA is updated to reflect new information from developers. The SHLAA is an iterative process and as new information is received from developers it is included. This point was made to developers at the developer workshop in January 2015.
- 8.2.15. In response to a number of representations regarding the landscape assessments in the earlier versions of the SHLAA, Land Use Consultants were appointed to review the landscape constraints of SHLAA sites which were achievable and deliverable (January 2015). The remit of this study was to establish if any sites that had previously being ruled out on landscape grounds had some capacity for development. The conclusions of this work were fed into the SHLAA assessments and the conclusions of the SHLAA were amended to take into account the findings of the study. This ensured that a robust and consistent approach to landscape was applied in the assessment and resulted in amended site yields where appropriate.
- 8.2.16. Representors suggest that the SHLAA accepts constraints without testing appropriateness. The SHLAA excludes sites due to landscape constraints, but also includes other sites where it is considered that those constraints could be overcome. The SHLAA is by its very nature a high level assessment and does not benefit from the level of detail, such as the scale and form of development that would be submitted at a planning application stage, which may then result in the site being considered suitable for development in landscape terms. Landscape is not the only consideration when considering a sites suitability for development, a site maybe suitable in landscape terms but there may be other reasons the make the site not developable such as infrastructure constraints.
- 8.2.17. A representor suggested that the SHLAA uses the designation of ‘multifunctional green space’ to limit the number of developable sites. In earlier versions of the SHLAA open space and land for sport and recreation were excluded from further detailed assessment. Following comments received at the developer workshop in January 2015 these sites were given a full assessment if they met other criteria. However, many sites that fall into this category are not categorised as being suitable for development as the NPPF para 74 requires demonstration that a site was surplus to open space requirements. In most cases this evidence has not been provided.

8.3 To what extent is the Sustainability Appraisal preferred option (Focus development within or adjacent to Burgess Hill, East Grinstead and Haywards Heath, but encourage both larger villages and smaller villages to take growth to support the provision of additional services and meet local needs) reflected in the distribution of strategic allocations and the overall spatial strategy of the submitted plan?

The preferred distribution strategy in the Sustainability Appraisal allows proportionate growth at all settlements. The growth anticipated at the settlements within the District follows this strategy (as discussed further in Q.6).

- 8.3.1. The Sustainability Appraisal (BP5) identifies option (D) to be the most sustainable distribution strategy (page 102). This option is:
- 8.3.2. *“Focus development towards areas where housing and economic need is arising, including need arising from outside Mid Sussex. This will predominantly be within or adjacent to the*

three towns (Burgess Hill, East Grinstead and Haywards Heath), but encourages villages to take growth to support the provision of additional services and meet local needs. It will also focus development at strategic locations that could best assist in meeting the District housing need and the unmet needs of neighbouring authorities”

- 8.3.3. The major strategic allocation is proposed at Burgess Hill (with a second, significantly smaller site, at Pease Pottage – the latter predominantly to assist in meeting unmet need from Crawley). East Grinstead and Haywards Heath have prepared Neighbourhood Plans, East Grinstead has been ‘made’, whilst Haywards Heath is scheduled to proceed to referendum in December 2016. Both towns are expected to see high levels of growth whilst bearing in mind the constraints upon them – especially East Grinstead which is particularly constrained by environmental designations with woodland including ancient woodland surrounding much of the town and a site of nature conservation importance to the east; by an administrative boundaries to the north with greenbelt designation; by protected landscape designation with the High Weald Area of Outstanding Natural Beauty to the east, south and south west of the town; and also subject to severe highway constraints. The strategic allocations, and development through Neighbourhood Plans therefore reflect the preferred distribution strategy set out in the SA.
- 8.3.4. This strategy is one that encourages growth to meet local needs. Although it has been shown (BP5, pages 124- 125) to be more sustainable to focus growth at larger settlements (in particular the three towns), this strategy also allows all settlements to grow according to their needs – the majority of these have undertaken this exercise through the development of their Neighbourhood Plan (including preparation of their own Sustainability Appraisals) and allocated land accordingly. There are made 14 Neighbourhood Plans in the district. It is, however, a high level strategy and the distribution of growth across the District will be affected by the suitability, sustainability and deliverability of individual sites.
- 8.3.5. As discussed in question 8.5 the level of development proposed through the plan period (either committed or already completed) broadly aligns with the Settlement Hierarchy outlined in policy DP6. The settlement hierarchy itself aligns with the broad principles for development distribution subject to this appraisal.

8.4 Can the allocation of the Pease Pottage site be reconciled with the SA and SHLAA findings? How is the site expected to relate to Crawley in terms of connectivity?

There are no suitable and deliverable alternatives which could deliver a development of this type and scale within MSDC. Given the proximity of the site to the service and facilities in Crawley it is likely that the Pease Pottage allocation will naturally relate to Crawley for strategic services.

- 8.4.1. The Pease Pottage Allocated site is site 666 in the SHLAA (May 2016, EP27). The SHLAA assesses the site as a commitment for 600 dwellings. The conclusion to this assessment states “*Site is entirely within the High Weald AONB and careful consideration would be required to the layout and design to mitigate impact on the features of the AONB. Poorly related to existing settlement and services required to support development, although there is potential for the provision of some services within the development”*.
- 8.4.2. A landscaping strategy has been provided to support the application and demonstrate that the development of the site can be mitigated in landscape terms.
- 8.4.3. The Council recognises that this site is not amongst those considered more sustainable by the Sustainability Appraisal. Decisions regarding the location of strategic allocations

carefully considered a variety of factors. In the case of the Pease Pottage allocation the following benefits were considered to outweigh the more negative impacts associated with the site (particularly given the efforts taken to mitigate those impacts as set out above). This includes:

- The need for a deliverable 5-year land supply in Mid Sussex
- The need to address some of Crawley's unmet need, which is significant. The site lies adjacent to the Crawley boundary. In sustainability terms the site is sustainably located to assist in meeting Crawley's needs (BP5, 7.137 – 7.140 and pages 107-109 refers).
- That the site is being promoted, available now, and able to deliver in the short-term, noting that this is not the case for some sites considered more sustainable in the SA (a number, as shown in the Strategic Site Selection Paper (EP23), are not being promoted and have no prospect of delivery in the short/medium term, if at all).
- The lack of alternative sites to accommodate this level of development within the early years of the plan.
- The potential benefits that could be delivered.
- The scope to mitigate any impact upon the landscape of the AONB and allow greater opportunity for recreational use.

8.4.4. These factors are considered to have greater weight compared with the negative impacts associated with this site option.

8.4.5. Further details regarding the connectivity of the site to Crawley have been included within the planning application (RD1 and RD2) and the developer has proposed:

- A bus service operating at a 15 minute frequency operating over a period sufficient early to facilitate shift change over at the proposed hospice;
- The provision of pedestrian guard railing at the approach to J11 of the M23 to discourage use of this route by pedestrians, and to focus pedestrian movements through improved routes as set out within our submission and Travel Plan;
- The package of off-site highway and junction improvements found necessary in the Transport Assessment such that overall the local highway network will operate with less delay and congestion in the 2015 development case scenarios when compared with the 2025 base case scenarios .
- The specific highway works within the immediate environs of the site found necessary in the Transport Assessment to address capacity, safety and accessibility issues, these include:
 - An Obligation to improve M23 Junction 11
 - An Obligation to ensure selected highways improvements to Brighton Road.
 - Travel plans establishing absolute targets for traffic movements associated with the specific uses proposed will be submitted to and approved by MSDC.

8.4.6. If a decision is taken to grant permission for this application the detail of these provisions would of course be confirmed via planning condition and/or Section 106 Agreement, subject to CIL Regulations 122/123 and the NPPF.

8.4.7. Given the proximity of the site to the service and facilities in Crawley it is likely that the Pease Pottage allocation will naturally relate to Crawley for strategic services. It is proposed that bus routes that originate in Crawley will serve the new development, cycle routes will also connect from the site into Crawley (linking onto existing routes).

8.4.8. Crawley Borough Council (CBC) has raised concerns about the impact the scheme will have on infrastructure such as putting additional pressure on secondary schools within the Borough. Discussions are currently underway with CBC to inform the negotiation on any

S106 agreement for the scheme to ensure the impact of the development is mitigated. A Statement of Common Ground with CBC is also being prepared.

8.5 – Does the Plan need an expressed stated spatial strategy for the District with target figures for each area to provide guidance for neighbourhood plans and for any future site allocations plan? What are the implications of not having such a strategy?

The Plan has an expressed spatial strategy for the District through its stated approach to development and the provision of a settlement hierarchy but with the exception of its approach to strategic development, it does not set targets for development for each area/settlement in Mid Sussex. Targets have not been set as not only was this considered inappropriate and against the ethos of the Plan in supporting the localism agenda, but unnecessary and inexact.

It can be demonstrated that development to date, including Neighbourhood Plans, has delivered a significant amount of sustainable development in general accordance with the settlement hierarchy without the setting of targets. In addition, the proposed approach for a site allocations DPD to deliver any residual development can continue to bring development forward not only at the requisite level, but within necessary timescales and in a sustainable manner.

- 8.5.1. To guide future development and support the development of sustainable communities, the District Plan (BP4) does have an expressly stated spatial strategy for the District. This is set out in its settlement hierarchy and the approach to development in the preamble to Policy DP6. This ensures that future development to meet Plan requirements is directed towards the most sustainable locations in accordance with the NPPF.
- 8.5.2. In general terms, it is broadly accepted that the most sustainable locations for development are those that are accessible to all sectors of the community, benefiting from a good range, or in close proximity to neighbouring settlements allowing to a certain extent, the sharing of local services and facilities such as shops, schools, recreational facilities and doctor's surgeries; with local employment opportunities; and easy access to public transport – with growth checked by overriding environmental constraints to development such as landscape designation; areas at high risk of flooding; and large areas of ecological constraints and ancient woodland. The Plan therefore sets out that it will focus the majority of housing and employment development at Burgess Hill, with a smaller strategic development at Pease Pottage as a contribution towards meeting the needs of the Northern West Sussex Housing Market Area; with residual development provided at the district's other towns and villages. Target figures are provided for these key strategic locations over the plan period, with 3,980 dwellings proposed at Burgess Hill; and 600 at Pease Pottage.
- 8.5.3. Alongside and to support the development of sustainable communities, the ethos of the District Plan is to support the localism agenda, as promoted through the Localism Act and the National Planning Policy Framework (paragraphs 183-185). As such, the Council's development strategy approach is for the location and nature of the residual development accounting for the District Plan strategic development allocations to be found through Neighbourhood Plans and a future site allocations document. This figure is known and can be planned in a sustainable manner in accordance with the settlement hierarchy.
- 8.5.4. Significant progress has been made on Neighbourhood Plans. Of the 20 Neighbourhood Plan areas that cover Mid Sussex, 16 are either made or have successfully passed referendum with only two areas with no draft Plan. The Neighbourhood Plan process has so far delivered allocations for housing in the order of 2,000 dwellings.

- 8.5.5. It is demonstrated in the table below that development to date, allocated through the development plan process, including Neighbourhood Plans and/or permitted planning permissions not only provides significant levels of development, but also generally accords with the settlement hierarchy, achieved without the setting of area or settlement development targets.

Parish	Commitments	Completions	District Plan	TOTAL	Category
Burgess Hill	1499	189	3500	5188	1
Haywards Heath	809	432		1241	1
Slaugham (1)	221	55	600	876	3/4
East Grinstead	504	365		869	1
Worth (2)	662	111		773	2
Hurstpierpoint and Sayers Common	250	65		315	2/3
Ansty and Staplefield (3)	231	42		273	4
Lindfield Rural (4)	191	19		210	3/5
Hassocks	103	41		144	2
Cuckfield	56	59		115	2
Turners Hill	92	1		93	3
Lindfield	2	88		90	2
West Hoathly	69	4		73	3
Ardingly	40	2		42	3
Bolney	34	1		35	3
Ashurst Wood	16	13		29	3
Albourne	9	11		20	3
Horsted Keynes	14	1		15	3
Balcombe	5	2		7	3
Twineham	3	0		3	4

(1) Slaugham Parish includes the settlements of Handcross (3), Pease Pottage (3) (including proposed DP allocation) and Slaugham (4)

(2) Worth Parish includes the settlements of Copthorne and Crawley Down

(3) Includes commitments to south of Haywards Heath

(4) Lindfield Rural includes the settlements of Scaynes Hill (3) and Walstead (5)

Table 10 - Commitments by Settlement

- 8.5.6. Although the Council provided, alongside the settlement hierarchy, guidance to Neighbourhood Plans in the form of a parish level OAN (HEDNA Nov 2015 - Table 24 – EP21), it would be difficult and, we think, inappropriate for the Council to apply these figures and impose top down targets directed towards individual settlements or areas.
- 8.5.7. The figures are considered too inexact for the purpose of setting targets. They are calculated based on the Mid Sussex OAN, proportioned down to parish level based on the households or population in each parish at the time of the 2011 Census. As such, this process has been undertaken in isolation from the Settlement Sustainability Review (EP52) / Settlement Hierarchy and is not influenced by the sustainability of each settlement or the availability/ suitability of sites or the settlement/s for growth. In many cases the parish level OAN calculation covers a wide area with numerous and sometimes very limited settlements and as such, use of the figures as a target for an area or settlement would likely result in the need for an immediate exercise of development distribution by the District Council. This

could also present issues later in the process where a settlement or an area could not deliver its target and a need to justify further redistributed within an area or to a settlement given that options are more limited at such a local level.

- 8.5.8. Such an approach was considered to put at serious risk support for the neighbourhood planning process by the parishes, latterly putting at risk undermining the findings of Neighbourhood Plan examiners and adopted Neighbourhood Plans, which ultimately have to succeed at local referendum. Agreement of the level of development was therefore considered a better judgement through the Neighbourhood Plan process, whereupon this exercise could sit alongside detailed local level work examining existing constraints to development; and potential future constraints to development such as infrastructure or transport; or the availability and testing of suitable sites.
- 8.5.9. The Council does not consider there to be negative implications of having a strategy without area or settlement targets. As outlined above, significant levels of development to date has come forward in a sustainable manner, in general accordance with the settlement hierarchy, without the setting of settlement or area targets. Whilst good progress has been made on the Neighbourhood Plans, to facilitate the process it was always expected that there would be a level of residual need and as such, as set out in Policy DP5 (BP4), allocations are required to be made by the Council through a site allocations DPD. The District Council will monitor progress and begin this process to ensure that an adequate supply of housing sites is quickly maintained and sufficient housing can be provided to meet requirements, both earlier and over the course of the plan period with an opportunity for the Parish Councils to review their plans alongside this process should they wish to do so.
- 8.5.10. The District Council will meet the residual requirement for housing and will continue to do so in a sustainable manner. It is therefore considered that this process does not require the setting of targets, particularly so at this stage of the process. The approach to development distribution for the site allocations process will not only take into account the settlement hierarchy, but also Neighbourhood Plan delivery (and the Neighbourhood Plan evidence base), delivery rates generally and the amount of completed windfall development; and will be tested through a further Sustainability Appraisal process to ensure that the Council's proposed approach is the most sustainable option, given reasonable alternatives. The approach adopted will be further scrutinised at the DPD examination.
- 8.5.11. It is noted that representations have been made that Policy DP6 is overly restrictive with regard to development outside of existing settlement boundaries. The policy has been amended since these representations were made to be permissive towards small-scale development (less than 10 dwellings) outside of defined built-up area boundaries providing it adjoins the settlement edge; and the development is demonstrated to be sustainable including by reference to the settlement hierarchy. This amendment provides flexibility in the provision of housing where sustainable and demonstrates further the positive, flexible approach taken by the Plan towards the provision of a sufficient housing land supply over the plan period.

9. Trajectories

9.1 What are the housing delivery trajectories overall and a reasonable estimate from the neighbourhood plans?

The Housing Implementation Plan (BP18) sets out the assumed housing trajectory for the submitted District Plan (page 3). The table on page 20, 'Commitments as at 1st April 2016 by type' gives a more detailed breakdown of the sites by type. A further breakdown of this housing trajectory is provided in Appendix 4. Since the Plan was submitted in August, progress continues to be made on the preparation of Neighbourhood Plans.

The Council is dependent upon landowners and developers to bring forward and develop sites within agreed timescales. In the run up to the Examination, developers, particularly for the major strategic allocation at Burgess have sought to change their position and in one case place a number of commitments on the Council to make a policy change on the current proposed allocation to allow some residential use on allocated employment land. In the light of these late changes the Council is reviewing its approach and will continue to work with developers and landowners to ensure it has a five year supply. The Council will also take account of submissions made in response to this question or the related questions 10.2 and 10.6.

- 9.1.1. Since the Plan was submitted in August, progress continues to be made on the preparation of Neighbourhood Plans. Table 11 below shows an up to do position (as at 7th November 2016) on Neighbourhood Plan progress. A further 7 plans have been made or have passed the Examination stage since April 2016, adding a further 1,213 units into the housing supply. This brings the residual figure to be allocated through the Site Allocations DPD or Neighbourhood Plans to 882. There are a further 290 units that could come forward from the Hassocks Neighbourhood Plan that is currently at Examination.
- 9.1.2. Of the 20 plan areas that have been designated in Mid Sussex there are only two plan areas that have not produced draft plans. Work is underway to prepare these plans, however, at this time the amount of housing to be allocated in them is, of course, currently uncertain.

Plan	Number of new units allocated	Allocation or new permission	Status of Plan
Cuckfield	29	All allocations	Made
West Hoathly	55	All allocations	Made
Hurstpierpoint	30 – 40	All allocations	Made
Ardingly	0	-	Made
Burgess Hill	322	New permission for 142 units	Made
Crawley Down	0	-	Made
Lindfield and Lindfield Rural	0	-	Made
Turners Hill	44	All allocations	Made
Twineham	20 (windfall)	-	Made
Ashurst Wood	87	All allocations	Made
Balcombe	42	All allocations	Made
Albourne	2	-	Made
Bolney	35 – 39	All allocations	Made
East Grinstead	411	New permission for 129 units	Made

Ansty and Staplefield	26	All allocations	Passed Examination
Haywards Heath	606	All allocations	Referendum 1 st December
Hassocks	290	130 units subject to current application	At Examination
Horsted Keynes	16		Regulation 14
Slaugham	No draft plan	-	-
Copthorne	No draft plan		
Total	2015 - 2029		

Table 11- Housing Supply from Neighbourhood Plans

- 9.1.3. It is important to note that this table only includes new commitments that have come forward through Neighbourhood Plans. Sites that already had planning permission ahead of the making of a Neighbourhood Plan are excluded from this list as these sites would already have been included as a commitment.
- 9.1.4. Beyond the neighbourhood plans, the trajectory relies on the strategic sites in the District plan and other 'windfalls'. The level of windfalls has been the subject of research and the assumptions are soundly-based (see EP28). In relation to strategic sites the Council is of course reliant on the actions and capability of developers to deliver in accordance with the trajectory.
- 9.1.5. Since the letter sent by Chris Tunnell to the Inspector on 29th September 2016 (MSDC1), Savills on behalf of the developers of the Northern Arc at Burgess Hill have written to the council, suggesting that they wish to withdraw the Trajectory previously provided. In particular they state:
- "It is apparent that the delivery trajectory contained in Annex D of MSDC's letter is taken from the IDS submitted to MSDC on behalf of Gleeson, Rydon and Wates in October 2015. It needs to be made clear that circumstances have changed since this IDS was drafted, and that the delivery trajectory has been withdrawn and cannot now be used as part of the Examination process".*
- 9.1.6. Subsequent discussions initially suggested a delivery rate considerably lower than anticipated. However, on the 1st November the Council received a letter from the developers' advisers 'Nexus Planning' advising the Council of a revised trajectory, delivering 255 units within the first 5 years, rather than the 515 units previously indicated. Moreover, this trajectory was provided with a number of caveats including placing commitments on the Council to make a policy change on the current proposed allocation of employment land south of the A2300 to allow for residential development on part of the site. This is an issue which has been under discussion for some time, as the allocation for employment has been proposed since 2015.
- 9.1.7. The Council has been working with three developers of this site, Wates, Rydon and Gleeson over a number of years to ensure the delivery of the Burgess Hill Northern Arch scheme. This is one of the largest housing growth allocations and the Council has received significant support from the Government for this proposal and progress is reported to Ministers. As a large scheme there are upfront infrastructure requirements and the Homes and Community Agency are offering potential and wide ranging support for early delivery and, where justified, improve the allocations viability and cash flow. It is therefore highly disappointing (and rather surprising) that the developers should reveal this position at this late stage. Several of proposed set of further modifications to the plan in relation to this allocation, had been discussed with the developers and were designed to support an early delivery position. These included a possible reduction in required densities, acceptance of a commuted payment in lieu of onsite Gypsy and Traveller provision, and the use of

alternative land currently outside developer's control for some of the required education provision in order to maximise the developable area for housing. The Council has also offered a planning performance agreement type arrangement to ensure applications are handled as efficiently as possible. The main area of ongoing debate with developers had been the proposed starter homes policy, but as developers are aware (from Chris Tunnell's letter of 29/9/16) the Council is happy if that modification is held in abeyance.

- 9.1.8. The first planning application was submitted to the Council in September 2016, for 130 dwellings by Rydon for the eastern section of the site. Officers have been in pre-application discussions for a second application from Rydon for 450 dwellings (this includes the first application for 130 dwellings). Recent indications in the last few weeks were that this would be submitted by the end of the October 2016, but we are now advised that this is delayed until after the initial examination sessions. Further early applications are also been expected on the western side of the site, linked to HCA support.
- 9.1.9. The Council has recently received a cost plan for the infrastructure and is keen to see a fuller viability and market assessment to understand the apparent new delivery challenges of this allocation. At a recent meeting with developers it was suggested that the delays were due to planning risks and the time taken to secure consent particularly on future reserved matter applications (despite the Council's offer of a Planning Performance Agreement and the Council's record of timely decision making against national targets).
- 9.1.10. The issue of delays associated with a future shortage of construction skills and the time taken to advance design and tenders were also suggested in discussion as factors that had justified the apparent change of heart on the trajectory. These issues are, of course, of concern to the Council because they are unlikely to be site specific and may suggest that there are underlying problems in the market's ability to deliver across the district, although the overall evidence for this appears limited.
- 9.1.11. Having received this late intervention to the trajectory the Council is actively working with developers and landowners and carefully considering its next response. The Council will continue to engage with the developers between now and the hearing session to see if common ground on an improved trajectory can be reached. Through our regular discussions with other developers the Council will also reconsider the delivery trajectory of alternative sites to Burgess Hill. The Council will be able to provide an update on the position before or at the examination hearings and likewise the development consortium will also be able to put their case for their late change.

9.2 What are the reasons for the proposed timing of the site allocations plan?

The proposed timeframe for the production of the site allocations document is based on the premise of requiring new sites to meet the 'residual amount' of the housing required as set out in DP5, in the latter years of the Plan. Having a Site Allocations document adopted in 2021 will allow a reasonable window for all the District's Neighbourhood Plans to come forward with their proposed new sites and therefore the Council will have the full picture as to what the 'residual amount' is, once all Neighbourhood Plans have been adopted.

- 9.2.1. As well allocating the 'residual amount' of the housing requirement, the Site Allocations DPD may also be used to address any shortfall in the 5 year supply. Our current 5 year land supply shows sufficient supply up to 2021. Whilst the Council considers that the proposed timeframe set out is the most appropriate at this moment in time, annual monitoring of the housing land supply will enable the Council to make regular assessments as to whether this timeframe remains appropriate.

10. Five year housing land supply

10.1 Given the advice in the PPG, what reason does the Council have for favouring the Liverpool methodology?

Using the alternative Sedgefield methodology would run counter to the evidence of housing delivery in the District as outlined in Section 4 of Chris Tunnell's letter of 29 September 2016 to the Inspector (MSDC1). Front loading undersupply to make the annual requirement in the next 5 years yet more demanding and would lead to an unrealistic Plan.

10.1.1. The Council recognises that the PPG suggests local planning authorities should “aim to deal with any undersupply within the first 5 years of the plan period where possible”.⁵ Given the particular circumstances of housing delivery in Mid Sussex, the Council has carefully considered the most appropriate methodology for calculating land supply. The disparity between average annual completion rates (661) for the past 5 years and the proposed provision of 800dpa demonstrates that there is a significant amount of work for the housing market to do in order to achieve the new provision. The delivery of 868 dwellings in 2015/16 demonstrates that the requirement is achievable, but reaching this level on a consistent basis is likely to take time.

10.1.2. The Council accepts that past under delivery means that it needs to apply a 20% buffer to the 5 year requirement. This will also serve to significantly boost further the supply of housing in Mid Sussex. However, it will also put further pressure on the housing requirement if Sedgefield method were to be applied.

10.2 What is a realistic estimate for the contribution from deliverable sites in the next 5 years?

The Housing Implementation Plan provides an explanation of the 5 year supply position (section 5, page 6) and Appendix 2, page 20, ‘Commitments as at 1st April 2016 by type’ shows which sites have been included in the 5 year supply in the submitted plan. This has been annotated further to provide information on the progress of delivery and is set out in Appendix 5. The delivery rates are based on assumptions agreed at the SHLAA developer workshop held in January 2015 (page 14 of SHLAA main report) where a rate of 50 dwellings per year for a single builder and 75/100 if there are 2 builders on site was felt to be realistic. The table at appendix 6 shows the historic build out rates on a mix of sites in Mid Sussex. This shows that the delivery rates included within our 5 year supply assumptions are not unreasonable.

10.2.1. The issue of the viability of sites within the 5 year supply has been raised by developers at recent planning appeals in Mid Sussex. Paragraph 47 of the NPPF requires local planning authorities to identify a supply of specific deliverable sites sufficient to provide five years' worth of housing. To be deliverable sites should be available now, offer a suitable location for development now and have a realistic prospect of delivery within 5 years and in particular that the development of the site is viable.

10.2.2. BNP Paribas have undertaken a Community Infrastructure Levy and District Plan Viability Study (EP 43). The Report tests the ability of a range of developments to be viability developed over the plan period. This work has assisted the Council in understanding the viability of potential development sites across the plan period. The study looked at 94 SHLAA sites and assessed viability against District Plan policies and affordable housing

⁵ National Planning Practice Guidance, Housing and economic land availability assessment, Paragraph: 035

scenarios. The results generated by this base position indicate that the Council's flexible approach to affordable housing delivery (i.e. subject to individual site circumstances and scheme viability) will ensure that most developments can come forward over the economic cycle (paragraph 7.2). However, the report noted that it is critical that developers do not over-pay for sites such that the value generated by developments is paid to the landowner, rather than being used to provide affordable housing. The Council should work closely with developers to ensure that landowners' expectations of land value are appropriately framed by the local policy context (paragraph 7.4).

10.2.3. The study indicates that a number of previously developed sites may not be viable under some affordable housing policy options. The most significant one is the Burgess Hill Town Centre Scheme, which is included within the 5 year supply. Planning permission has now been granted on this site for a scheme which does not include any provision of affordable housing. This demonstrates that the Council does take a flexible approach to the application of affordable housing policies to ensure the overall delivery of housing and schemes that offer a wider community benefit. This also demonstrates that the Council is prepared to cooperate with developers to overcome viability issues.

10.2.4. As noted in the response to Question 9.2, since the letter sent by Chris Tunnell to the Inspector on 29th September 2016, Savills on behalf of the developers of the Northern Arc at Burgess Hill have written to the council, suggesting that they wish to withdraw the Trajectory previously provided. In particular they state:

"It is apparent that the delivery trajectory contained in Annex D of MSDC's letter is taken from the IDS submitted to MSDC on behalf of Gleeson, Rydon and Wates in October 2015. It needs to be made clear that circumstances have changed since this IDS was drafted, and that the delivery trajectory has been withdrawn and cannot now be used as part of the Examination process".

10.2.5. Subsequent discussions initially suggested a delivery rate considerably lower than anticipated. On the 1st November the Council received a letter from the developers' advisers 'Nexus Planning' advising the Council of a revised trajectory, delivering 255 units within the first 5 years, rather than the 515 units previously indicated. Moreover, this is trajectory was provided with a number of caveats. These include asking the Council to make a policy change on the current proposed allocation of employment land south of the A2300 to allow for residential development on part of the site.

10.2.6. The Council has been working with three developers of this site, Wates, Rydon and Gleeson over a number of years to ensure the delivery of the Burgess Hill Northern Arc scheme. This is one of the largest housing growth allocations in the south east and the Council has received significant support from the Government for this proposal and, it is understood that progress is reported to Ministers. As a large scheme there are upfront infrastructure requirements and the Homes and Community Agency are offering potential and wide ranging support for early delivery. It is therefore highly disappointing (and rather surprising) that the developers should change their position at this late stage. Several of the last set of proposed modifications to the plan in relation to this allocation were designed to support an early delivery position, and has been discussed with the three developers. These modifications include: a possible reduction in density; acceptance of possible commuted payments in lieu of onsite Gypsy and Traveller provision; and the use of alternative land currently outside developer's control for some of the required education provision – which was offered in order to maximise the developable area for housing.

10.2.7. The Council has also offered a planning performance agreement type arrangement to ensure applications are handled as efficiently as possible. Until these recent interventions and beyond their wish to be able to include some of the employment land for additional housing, the main area of ongoing debate with developers had been the proposed starter

homes policy. However, as developers are aware (from Chris Tunnell's letter of 29th September 2016 to the Inspector) the Council is happy if that the modification to the affordable housing policy is held in abeyance until the Government issues further guidance on starter homes.

- 10.2.8. The first planning application on the Northern Arc was submitted to the Council in September 2016, for 130 dwellings by Rydon for the eastern section of the site. Officers have been in pre-application discussions for a second application from Rydon for 450 dwellings (this includes the first application for 130 dwellings). Recent indications in the last few weeks were that this would be submitted by the end of the October 2016, but the Council were advised last week that this application has been delayed until after the initial examination sessions.
- 10.2.9. The Council has recently received a cost plan for the infrastructure and is keen to see a fuller viability and market assessment to understand the apparent new delivery challenges of this allocation. At a recent meeting with developers it was suggested that the delays were due to planning risks and the time taken to secure consent particularly on future reserved matter applications (despite the Council's offer of a Planning Performance Agreement and the Council's record of timely decision making against national targets).
- 10.2.10. One of the developers (Gleeson) has also suggested that a future shortage of construction skills and the time taken to advance design and tenders as factors have influenced the apparent change of heart on the trajectory. These issues are, of course, of concern to the Council because they are unlikely to refer to this allocation alone specific and may suggest that there are underlying problems in the market's ability to deliver across the district.
- 10.2.11. Having received these late interventions on the trajectory the Council is actively working with developers and landowners. The Council will continue to engage with the developers between now and the hearing session. Through our regular discussions with other developers the Council is also considering the delivery rates of other sites beyond Burgess Hill. The Council will be able to provide an update on the position before or at the examination hearings and likewise the development consortium will also be able to put their case for their late change.

10.3 What is the level of under-provision from the start date of 2014?

Under-provision equates to 102 units, as set out below.

	Requirement	Completions	Under/oversupply
2014/2015	800	630	-170
2015/2016	800	868	+68
Total	1600	1498	-102

Table 12 - Under Provision

10.4 With regard to the 'buffer', what is the District's record of housing provision over the economic cycle?

Table 13 shows historical completions rates over the past 10 years including the last economic recession that commenced during 2008/09. This shows that there was a decline in the number of completions, until the market started to pick up in 2011/12. 2012/13 saw a larger number of completions as building rates picked up on a numbers of larger sites. As set out in Appendix 2 it is the larger sites that generally see lower delivery rates during times of economic recession.

10.4.1. The 20% buffer is in place for authorities with persistent under delivery to provide a realistic prospect of achieving the planned supply and to ensure choice and completion in the market for land (NPPF 47). Therefore there is no need to increase a housing target further to allow for past under delivery, otherwise the authority will be penalised twice for under delivery.

10.4.2. Historically the build rate experienced at Mid Sussex is an average of 515 dwellings per year (for the period 2006-2016). Although the picture is improving with an average of 661 units over the past 5 years, this demonstrates that a housing requirement of an average of 800 dwellings per year over the plan period will be a very challenging target for the authority to meet. It also shows that the target does serve to boost significantly the supply of housing in Mid Sussex, as required by the NPPF (paragraph 6) as the target is well above the level of housing that has been historically provided.

2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16
337	502	480	353	179 ⁶	522	749	536	630	868

Table 13 - Housing Completions

⁶ This is an exceptionally low year due to the loss of 109 units at a social housing scheme that year.

10.5 Having regard to the above, what is the 5 year housing supply using the Sedgefield methodology?

As at 1st April 2016 (using Sedgefield methodology)

		Note
Requirement		
District Plan housing requirement 2015 - 2020	4,000	800 annual requirement x 5 year
Shortfall in delivery year 14/15, 15/16	102	
Total requirement over first five years	4,102	
Total 5 year requirement with 20% buffer applied (years 1 -5 only)	4,922	4,102 plus 20%
Supply		(Sites listed in Appendix 5)
Commitments		
Large allocated sites without planning permission	199	
Large sites with planning permission	3,443	
Sites identified in the SHLAA (years 1 -5)	239	
Small sites with planning permission (with 40% discount applied)	317	
Other sources of Supply		
District Plan allocation at Burgess Hill	515	
District Plan allocation at Pease Pottage	150	
Total Housing Supply in year 1 - 5	4,863	
Five year supply	4.94	Total supply/Total requirement x 5
Surplus/minus over period	-59	

Table 14 - Sedgefield Calculation

10.6 Will the plan's strategic allocations and policies, together with allocations from neighbourhood plans and any future site allocations plan, ensure that sufficient sites are available for a 5 year supply of deliverable land to be maintained into the future? What adjustments might be made to the plan to ensure a reliable supply?

The Council is very keen to establish and maintain a 5 year sustainable land supply and is very familiar with the consequences of not having such a supply in place from the current 'free for all'. The plan's strategic allocations and policies, together with allocations from neighbourhood plans and the commitment to a future site allocations plan, will be used by the Council to ensure that sufficient sites are available for a 5 year supply of deliverable land to be maintained into the future. No adjustments to the District Plan are required to ensure this reliable supply.

- 10.6.1. The SHLAA, housing trajectory and the information contained in questions above demonstrate that sufficient sites are likely to be available to demonstrate 5 year supply of deliverable land to be maintained into the future.
- 10.6.2. The District Plan will provide the strategic framework for guiding future development in the District. It will also provide a suite of NPPF compliant policies that can be used to manage development in Mid Sussex. The District Plan will also enable the District Council to adopt a CIL charging schedule to ensure that the appropriate infrastructure can be put in place alongside future development. The District Plan allocates land for two strategic sites that will make an important contribution to housing supply, but also supports economic growth in the District.
- 10.6.3. The Council has committed to preparing a Site Allocations DPD which will enable the residual amount of housing to be delivered to ensure that the full plan provision can be met and that a 5 year supply of housing can be maintained. Whilst the Council has indicated that work will commence on the preparation of the DPD in 2019, this can be brought forward, if monitoring suggests this is required. There is also the opportunity for Town and Parish Councils to review the Neighbourhood Plan and allocate additional housing sites if they want too.

APPENDICES

1- Q5: Affordable Housing Policy and Needs

2 - Q6:Dwellings Granted v Dwellings Completed

3 - Q8: Summary of Sustainability Appraisal (BP5) – Housing Provision: Environmental Objectives

4 - Q9: Breakdown of Housing Trajectory

5 - Q.10: Commitment Schedule for 800pa - Sites deliverable in year 1 - 5. As at 1st April 2016 (position updated October 2016)

6 - Q10: Completion rates on Greenfield sites

APPENDIX 1

Figure 3 - Pre-Submission Draft District Plan (June 2015), as set out in BP2 (30%)

The Council will seek:

- *the provision of a minimum of 30% affordable housing for all residential developments providing a net increase of 11 dwellings and above or a maximum combined gross floorspace of more than 1000m²; or*
- *for residential developments in the High Weald Area of Outstanding Natural Beauty providing a net increase of 6 – 10 dwellings, a commuted payment towards off-site provision, equivalent to providing 30% on-site affordable housing. The payment would be commuted until after the completion of the dwellings within the development.*

A mix of tenure will be required (normally approximately 75% social or affordable rented homes, with the remaining 25% for intermediate homes, unless the best available evidence supports a different mix).

Proposals that do not meet these requirements will be refused unless significant clear evidence is provided to show that the site cannot support the required affordable housing from a viability and deliverability perspective.

Free serviced land should be made available for the affordable housing, which should be integrated with market housing and meet the Design and Quality Standards published by the Homes and Communities Agency or any other such standard which supersedes these.

Details about the provision of affordable housing will be set out in a Supplementary Planning Document.

The policy will be monitored and kept under review having regard to the Council's Housing Strategy and any changes to evidence of housing needs.

Figure 4 - Proposed modifications to DP29 intended for consideration through the Examination, as set out in BP4 (40%):

The Council will seek:

- *For all residential developments with a site area which exceed 0.5 hectares in size (irrespective of the number of dwellings or the combined gross floorspace area to be provided), the provision of a minimum 20% starter homes will be made along with the appropriate provision of other affordable housing as required;*
- *For residential developments providing a combined gross floorspace area of more than 1,000m² but a net increase of less than 10 dwellings and with a site area of less than 0.5 hectares in size, the provision of a minimum of 40% affordable housing (with no starter homes) in accordance with the tenure mix stated below;*
- *For residential developments providing a net increase of 10 dwellings, the provision of a minimum 20% starter home units. If such sites exceed a maximum combined gross floorspace area of more than 1,000m² the provision of a minimum 40% affordable housing provision of which 20% will be starter home units with the remaining 20% affordable housing provision will also be provided, in accordance with the tenure mix stated below;*
- *For all residential developments providing a net increase of 11 dwellings or above (irrespective of if a combined gross floorspace area of 1,000m² is exceeded), a minimum 40% affordable housing provision. 20% of the affordable housing provision will be starter home units with the remaining 20% affordable housing provision provided in accordance*

with the tenure mix stated below;

Within the High Weald Area of Outstanding Natural Beauty:

- *For residential developments providing a net increase of 6 –9 dwellings, a commuted payment towards off-site provision, equivalent to providing a minimum 40% on-site affordable housing(with no starter home units) in accordance with the tenure mix stated below.*
- *For such sites exceeding 0.5ha, a minimum 40% affordable housing provision of which half will be on-site starter home units; and half other forms of affordable housing as a commuted payment towards off-site provision, equivalent to providing the remaining half of the affordable housing on-site in accordance with the tenure mix stated below.*

Payment for off-site provision would be commuted until after the completion of the dwellings within the development.

- *For all residential developments providing a net increase of 10 dwellings, the provision of a minimum 40% affordable housing. Half of the affordable housing provision will be starter home units. A commuted payment will also be made towards off-site provision, equivalent to providing the remaining half of the affordable housing on-site in accordance with the tenure mix stated below.*

The payment for affordable housing excluding starter homes would be commuted until after the completion of the dwellings within the development.

Tenure mix – For the provision of affordable housing other than starter home units, a mix of tenure will be required (normally approximately 75% social or affordable rented homes, with the remaining 25% for intermediate homes, unless the best available evidence supports a different mix). Details on tenure mix and the provision of affordable housing will be set out in a supplementary planning document.

Proposals that do not meet these requirements will be refused unless significant clear evidence is provided to show that the site cannot support the required affordable housing from a viability and deliverability perspective. Details of the evidence required to justify a revision to the affordable housing requirements will be set out in a Supplementary Planning Document.

Free serviced land should be made available for the affordable housing (except Starter Home units). All affordable housing, should be integrated with market housing and meet national technical standards for housing including “optional requirements” set out in this District Plan (Policies DP25: Dwelling Space Standards; DP26: Accessibility and DP42: Water Infrastructure and the Water Environment) or any other standard which supersedes these.

The policy will be monitored and kept under review having regard to the Council’s Housing Strategy and any changes to evidence of housing needs.

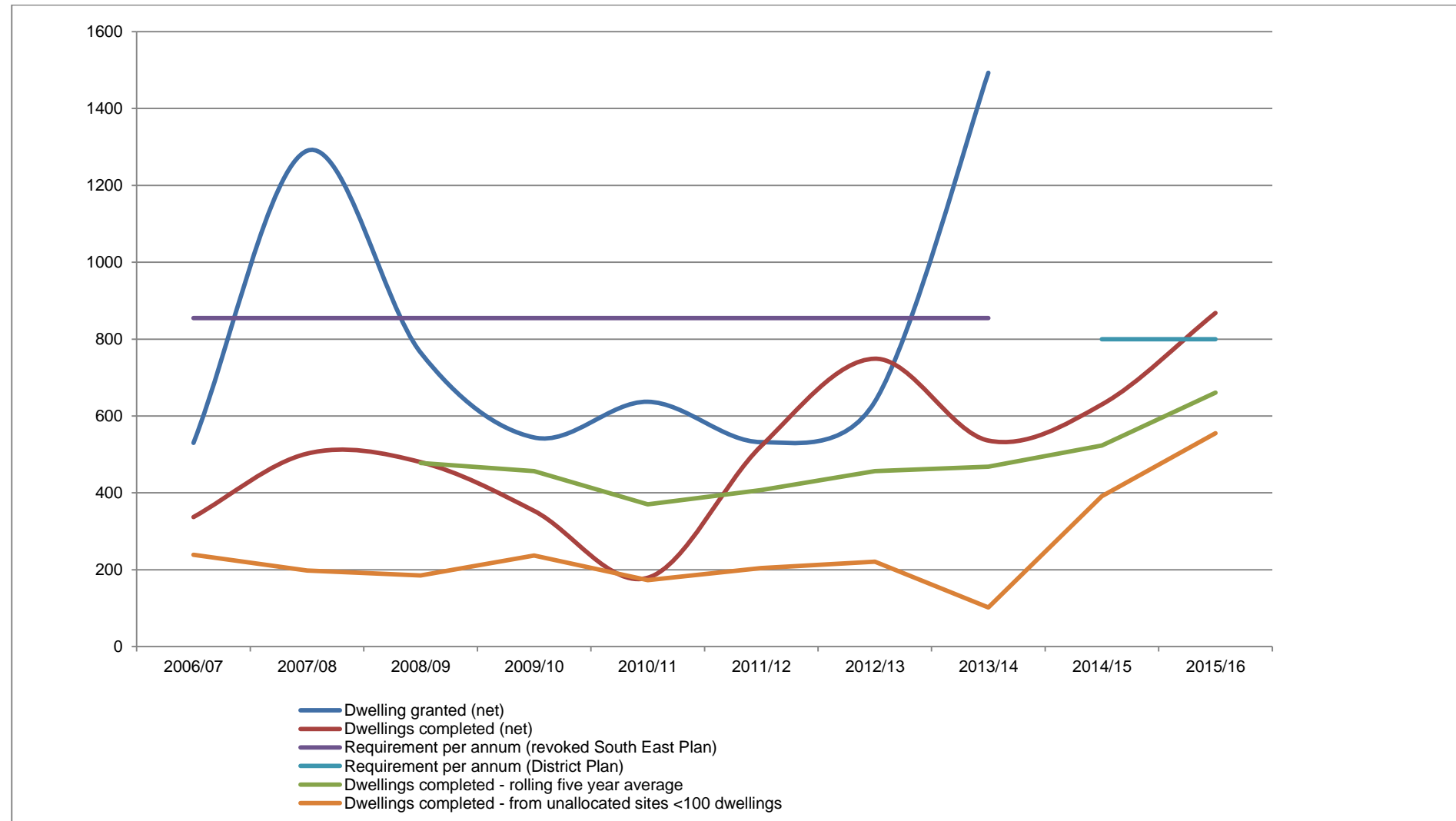
Affordable Housing Needs – Reasonable Preference Using District Plan housing target

Step			Source
Stage 1: Current Housing Need (Gross)			
1.1	Homeless Households and those in Temporary Accommodation	0	LA Waiting List
1.2	Overcrowding and Concealed Households	0	LA Waiting List
1.3	Households in Need in Reasonable Preference Groups	255	LA Waiting List
1.4	Total Current Affordable Housing Need (Gross) (1.1 + 1.2 + 1.3)	255	
Stage 2: Future Affordable Housing Needs			
2.1	New Household Formation (Gross)	800	Local Authority
2.2	Proportion of Households Unable to Buy or Rent	44.2	CACI Paycheck, VOA and TPD data
2.3	Existing Households Falling into Need and Housed per Annum	105	CORE
2.4	Total Newly Arising Need (Gross Per Year) (2.1 x 2.2 + 2.3)	459	
Stage 3: Affordable Housing Supply			
3.1	Affordable Dwellings Occupied by Households in Need	0	LA Monitoring Records
3.2	Surplus Affordable Housing Stock	0	LA Monitoring Records
3.3	Committed Supply of New Affordable Housing	1223	LA Monitoring Records
3.4	Units to be taken out of Management	0	Local Authority
3.5	Total Available Affordable Housing Stock (3.1 + 3.2 + 3.3 - 3.4)	1223	
3.6	Annual Supply of Social Re-lets (net)	128	CORE
3.7	Annual Supply of Intermediate Affordable Housing for sale/let at sub-market level	43	CLG Live Table 1007
3.8	Annual Supply of Affordable Housing (3.6 + 3.7)	171	
	Total Net Need (1.4 - 3.5)	-968	
	Annual Flow Backlog (10%) of Total Net Need - 10yr period to relieve	-97	
	Net Annual Housing Need (2.4 + Annual Flow - 3.8)	191	

Step			Source
Stage 1: Current Housing Need (Gross)			
1.1	Homeless Households and those in Temporary Accommodation	0	LA Waiting List
1.2	Overcrowding and Concealed Households	0	LA Waiting List
1.3	Households on waiting list	1286	LA Waiting List
1.4	Total Current Affordable Housing Need (Gross) (1.1 + 1.2 + 1.3)	1286	
Stage 2: Future Affordable Housing Needs			
2.1	New Household Formation (Gross)	800	Local Authority
2.2	Proportion of Households Unable to Buy or Rent	44.2	CACI Paycheck, VOA and TPD data
2.3	Existing Households Falling into Need and Housed per Annum	105	CORE
2.4	Total Newly Arising Need (Gross Per Year) (2.1 x 2.2 + 2.3)	459	
Stage 3: Affordable Housing Supply			
3.1	Affordable Dwellings Occupied by Households in Need	0	LA Monitoring Records
3.2	Surplus Affordable Housing Stock	0	LA Monitoring Records
3.3	Committed Supply of New Affordable Housing	1223	LA Monitoring Records
3.4	Units to be taken out of Management	0	Local Authority
3.5	Total Available Affordable Housing Stock (3.1 + 3.2 + 3.3 - 3.4)	1223	
3.6	Annual Supply of Social Re-lets (net)	128	CORE
3.7	Annual Supply of Intermediate Affordable Housing for sale/let at sub-market level	43	CLG Live Table 1007
3.8	Annual Supply of Affordable Housing (3.6 + 3.7)	171	
	Total Net Need (1.4 - 3.5)	63	
	Annual Flow Backlog (10%) of Total Net Need - 10yr period to relieve	6	
	Net Annual Housing Need (2.4 + Annual Flow - 3.8)	294	

Table A - Under Policy B, (at 40% overall provision with SH) this provides the potential to increase the supply of such housing as outlined in Table 7

A	B	C	D	E	F	G	H	I	J	K	Over/ Under Supply of Affordable Rent and Intermediate Housing	
AH Policy Req.	HEDNA need		Total Planned Housing (DPA)	Total AH Supply	SH Supply Delivered (20%)	Non-SH Affordable Housing Supply	Affordable Rent Supply	Shared Ownership Supply	Residual Affordable Housing Need		Reasonable preference groups	Total waiting list
	'Low' estimate – reasonable preference groups	'High' estimate – total waiting list		$D \times A$	$D \times 20\%$	$E - F$	$G \times 75\%$	$G \times 25\%$	HEDNA need (low estimate minus 51 households potentially met by SH provision)	HEDNA need (high estimate minus 44 households potentially met by SH provision)	$G - J$	$G - K$
40%	191	294	800	320	160	160	120	40	140	250	20	-90
40%	213	316	850	340	170	170	128	43	162	272	8	-102
40%	235	338	900	360	180	180	135	45	184	294	-4	-114
40%	257	360	950	380	190	190	143	48	206	316	-16	-126
40%	279	382	1000	400	200	200	150	50	228	338	-28	-138

APPENDIX 2**Q6: Dwellings Granted v Dwellings Completed.**

APPENDIX 3

Q.8: Summary of Sustainability Appraisal (BP5) – Housing Provision: Environmental Objectives

	800 dpa	850 dpa	Justification
Objective 6: Flood risk	0	-?	The SHLAA indicates 800dpa could be met without needing to build on sites at risk from flooding. However, higher provision options cannot be satisfied by the pool of suitable sites within the SHLAA, increasing the risk of an 'unsuitable' site being needed. This increases the risk of a site with flood risk being required (dependant on location).
Objective 7: Efficient land use	-	--	A provision of 800dpa could be met with a mix of brownfield development, greenfield development and 2/3 strategic (greenfield) sites. The plan indicates that these are Kings Way (DP8), the Northern Arc (DP9), and Pease Pottage (DP9a). Increasing the housing provision to, say, 850dpa would require a further 850 units to be found over the plan period. It is therefore highly likely a further strategic site would need to be found, increasing the level of greenfield development. Some borderline acceptable sites (in landscape, environmental and sustainability terms) may be required, and in order to make these acceptable a lower density would be required, which would not make efficient use of land. The supply of suitable/available brownfield sites is finite.
Objective 8: Conserve and enhance biodiversity	-?	-	The Capacity Study indicates only 4% of the District is not constrained to some degree, or already built on. Higher growth scenarios would increase the likelihood of development impacting designated biodiversity sites, including the Ashdown Forest SAC/SPA.
Objective 9: Protect and enhance the countryside	-	--	A provision of 800dpa could be met with a mix of brownfield development, greenfield development and 2/3 strategic (greenfield) sites. The plan indicates that these are Kings Way (DP8), the Northern Arc (DP9), and Pease Pottage (DP9a). Increasing the housing provision to, say, 850dpa would require a further 850 units to be found over the plan period. It is therefore highly likely a further strategic site would need to be found, and as there is only a finite supply of previously developed (brownfield) land, this is likely to require a site(s) currently designated as countryside. Approximately 60% of the District is covered by AONB or National Park, and the Council is already proposing an allocation within the AONB to meet a provision of 800dpa (other reasonable alternatives have been rejected as unsuitable, unsustainable or undeliverable at this time). Increasing the housing requirement would significantly risk further development in the countryside.
Objective 11: Reduce road congestion	-?	-	The Mid Sussex Transport Study (EP41) has tested development levels of 800dpa, and has flagged capacity issues and mitigation based on this level of development. Some areas of the District, in particular

			East Grinstead, suffer from existing transport capacity issues. Although this is not currently expected to worsen as a result of development proposed in the District Plan, further allocations of land or increases to housing provision risk increasing transport congestion. Similarly, increased development levels could increase the risk of pollution-related issues within the Ashdown Forest SAC/SPA.
Objective 13: Maintain and Improve water quality	-?	-	The Water Cycle Study (EP46) identified wastewater capacity issues for development levels exceeding 850dpa. The District Plan proposals at 800dpa can be accommodated by capacity at the wastewater treatment works, however development in excess of this (in particular in areas that would drain to the Goddards Green WwTW) would lead to uncertainty with regards to capacity.

APPENDIX 4

Question 9: Breakdown of Housing Trajectory

Trajectory "District Plan"										Plan Period →																									
Strategic Site allocations and Neighbourhood Plan Supply Options										PAST COMPLETIONS					PROJECTED SUPPLY / COMPLETIONS																				
										2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	
x	Commitments																																		
x	District Plan Allocation with permission (East of Kings Way)																																		
	District Plan allocation (North Burgess Hill)																																		
	District Plan allocation (Pease Pottage)																																		
	Strategic Housing Land Availability Assessment sites (not in planning process)																																		
	Windfall allowance																																		
	Residual NP/DPD requirement (SHLAA sites but unknwn which sites)																																		
	Supply Options (tick boxes below)																																		
x	Annual Supply (net)										337	502	480	353	179	522	749	536	630	868	854	878	1,053	1,054	1,023	809	809	809	809	809	649	649	649	649	599
	Cumulative Supply (net)																		630	1,498	2,352	3,231	4,283	5,338	6,361	7,170	7,979	8,788	9,597	10,406	11,054	11,703	12,352	13,001	13,600
	PLAN. Annualised Requirement (net)																		800	800	800	800	800	800	800	800	800	800	800	800	800	800	800	800	
	Cumulative Requirement																		800	1,600	2,400	3,200	4,000	4,800	5,600	6,400	7,200	8,000	8,800	9,600	10,400	11,200	12,000	12,800	13,600
	Backlog																		170	102	48	-31	-283	-538	-761	-770	-779	-788	-797	-806	-654	-503	-352	-201	0
	Requirement + Backlog (Five Years)																			820	820	820	820	820											
	MONITOR. Cumulative Completions/Supply vs Cumulative Requirement																		-102	-48	31	283	538	761	770	779	788	797	806	654	503	352	201	0	
	MANAGE. Residual Requirement (Future Annualised) accounting for past completions										Includes NPFF Buffer formula options						973	968	964	957	932	722	695	685	673	658	638	609	607	603	594	569			
	MANAGE. Residual Requirement (Future Annualised) accounting for past completions										Does not include NPFF Buffer formula options						811	807	803	798	776	751	724	714	703	687	667	639	636	632	624	599			
	Residual Requirement (Year-on-Year)																		12,970	12,102	11,248	10,369	9,317	8,262	7,239	6,430	5,621	4,812	4,003	3,194	2,546	1,897	1,248	599	0

Total Supply: 13,600

APPENDIX 5

Q.10: Commitment Schedule for 800pa - Sites deliverable in year 1 - 5. As at 1st April 2016 (position updated October 2016)

Town / Parish	Site Address (sites of 6+ units)	Site Totals	Year 1 -5	SHLAA ID#	Agent/ Developer	Progress
Large sites where development has commenced						
Ansty & Staplefield	Land South of Rocky Lane, Haywards Heath (Phase 1)	96	64	239	Crest	Commenced
Ansty and Staplefield	Land South of Rocky Lane, Haywards Heath (Phase 2)	101	101	485	Crest	Commenced
Ardingly	Land between Lodglands and Standgrove Place, College Lane, Ardingly	36	36	187	Millwood Designer Homes	Commenced
Burgess Hill	Former Sewage Treatment Works, Burgess Hill	325	150	45	Fairbridge Development and Glenbeigh Developments	Commenced, G+T implemented. Site being decontaminated.
Cuckfield	Yew Tree Court, London Road, Cuckfield	10	10	695	Affordable Housing	Commenced
Cuckfield	Land Parcel East Of, Ardingly Road, Cuckfield, West Sussex	14	9	539	Barton Willmore/ Martin Grant Homes	Commenced
East Grinstead	218 London Road, East Grinstead.	14	14	259	Taylor Wimpey	Commenced
East Grinstead	South of The Old Convent & St Margarets Convent, Adj to Moatfield	74	56	97+98	Fairview	Commenced
East Grinstead	Land adj Ashplats House, Holtye Rd, East Grinstead	24	8	52	Barratt	Commenced
East Grinstead	Parish Hall, De La Warr Road, East Grinstead	8	8	639	Whitehall Homes and EGTC	Commenced
East Grinstead	Former Caffyns Garage, King Street, East Grinstead	12	12	524	Silver Birch Developments	Commenced
Burgess Hill	Keymer Tile Works Nye Road Burgess Hill	475	225	91	Croudace Homes	Commenced
Burgess Hill	Land East of Kingsway Burgess Hill	480	250	233	Sunley Estates	Commenced
Burgess Hill	Osborne House, Station Road, Burgess Hill	14	14	419	Wates Developments	Commenced
Burgess Hill	Land at 152 Leylands Road, Burgess Hill	6	6	739	mjh exective homes	Commenced
East Grinstead	St. Lukes House and St. Lukes Church, Holtye Avenue, EG	14	14	439	Whitgift Estates LTD	Commenced
East Grinstead	Farrington House, Wood Street, East Grinstead	41	41	313	Fifty Investment Development	Lawful start made but development on hold
East Grinstead	Sussex House, London Road, East Grinstead	35	8	409	Commonwealth properties	Application for additional floor remains
East Grinstead	St James House 150 London Road, East Grinstead	41	41	577	Individual	Commenced
East Grinstead	151 London Road, East Grinstead	4	4	758	Common Ground Consulting	Commenced
East Grinstead	151 London Road, East Grinstead	12	12	758	Common Ground Consulting	Commenced
East Grinstead	1 Christopher Road, East Grinstead	16	16	412	Whitehall Homes	Commenced
East Grinstead	extension to 1 Christopher Road, East Grinstead	10	10	412	Whitehall Homes	Commenced
Haywards Heath	East of hospital playing field (Parcel Y), Haywards Heath	88	17	109	Crest	Commenced
Haywards Heath	1 -3 Church Road, Haywards Heath	43	43	126	Churchill Retirement living	Commenced
Haywards Heath	Bolnore Village Phases 4b & 5, south west of Haywards Heath	181	136	110	Crest	Commenced
Haywards Heath	Bolnore Village Phase 4a	34	6	110	Crest	Commenced
Haywards Heath	Grosvenor Hall, Bolnore Road, Haywards Heath	10	10	638	Rosehart Properties LTD	Commenced
Haywards Heath	Land to west of Beech Hurst, Butlers Green Road, Haywards Heath	10	10	448	WT Lamb holdings, Aspen Retirement LTD and BUPA homes	Commenced
Haywards Heath	Magistrates Court, Bolnore Road, Haywards Heath	36	36	706	Renaissance Retirement LTD	Commenced
Haywards Heath	Norris House, Burrell Road, Haywards Heath	30	30	760	Westrock LTD	Commenced
Haywards Heath	Milton House, Milton Road, Haywards Heath	28	28	726	Milton House LTD	Commenced
Haywards Heath	Oldfield, 55 Lewes Road, Haywards Heath	10	10	700	Banner Homes Southern	commenced
Haywards Heath	36 Paddockhall Road, HH	9	9	454	Banner Homes Southern	Commenced
Haywards Heath	Beacon Heights, 4 Church Road, Haywards Heath	24	24	329	Becon heights developments LTD	Commenced
Hurstpierpoint	Land north of Fairfield Recreation Ground, Chalkers Lane, Hurstpierpoint	61	61	284	Barrats	Commenced
Lindfield Rural	Land to east of Gravelly Lane and South of Scamps Hill, Lindfield	217	158	494	Barrats and David Wilson	Commenced
Slaugham	Golf Club Driving Range, Horsham Road, Pease Pottage	95	95	600	Riverdale developments LTD	Commenced
Worth	Pasture Wood, Hophurst Lane, Crawley Down	8	9	7	Banner Homes Southern	commenced
Worth	Land east of Woodlands Close, Crawley Down (Phase 1)	44	3	518		Commenced
Worth	Land off Woodlands Close, Crawley Down (Phase 2)	51	51	672		commenced
Worth	Land at Wychwood, Turners hill Road, Crawley Down	22	23	272	Cala Homes	Commenced
	Total		1868			

Permissions not yet commenced						
Ansty and Staplefield	L/A Holly Bank, Deaks Lane, Ansty	7	7	627		recent permission
Bolney	Land West of London Road, Bolney	10	10	707	Affordable Housing	Some land to be transferred to owner from HA. Possible delay due to viability
Burgess Hill	Martlets, town Centre redevelopment, Burgess Hill	142	142	528	New River	New permission- agent confirms delivery 2019/2020
Burgess Hill	71 Victoria Road, Burgess Hill	14	14	693	Stone Cross Urban Regeneration / Enplan	Number of applications to discharge conditions. BC plans accepted.
Burgess Hill	69 Victoria Road, Burgess Hill	14	14	730	Individual	Number of applications to discharge conditions.
Burgess Hill	67 Victoria Road, Burgess Hill	12	12	501	Individual	New permission
Burgess Hill	70 Station Road, Burgess Hill	13	13	535	individual/ Enplan	Application to discharge conditions. BC plans approved
Burgess Hill	Land off Kings Way, Burgess Hill	64	63	46	enplan	Permission issued Oct 2016
Burgess Hill	Covers Timber Yard 107 Fairfield Road Burgess Hill	15	15	73	rdjw Architects	New permission
East Grinstead	R/O 17 Copthorne Road, Felbridge	25	25	548	Countryside Properties	No movement
East Grinstead	1 -25 Bell Hammer, East Grinstead	4	3	696	Affordable Housing	Application to amend permission refused as requires new application (DM/15/1860)
East Grinstead	Mead House, Cantelupe Road	5	5	737	Lodgecrest	Agent confirm works should start may 2016
East Grinstead	Home, 3 Cantelupe Mews, East Grinstead	8	8	766	Individual	Build regs submitted
East Grinstead	Superdrug, 78 London Road, East Grinstead	7	7	773	Individual	No movement
East Grinstead	The Vinesong Trust, Warrenside, College Lane, East Grinstead, We	14	14	444	The Trustees Vinesong	No movement
East Grinstead	Land at Blackwell Farm Road, East Grinstead	10	10	513	MSDC	No movement
East Grinstead	Tower Car Sales, Tower Close, East Grinstead	7	7	759	Individual	No movement
East Grinstead	Garland Court, Garland Road, East Grinstead	49	49	697	Churchill Retirement living	New permission
Hassocks	Stafford House 91 Keymer Road Hassocks	14	14	472	CCHF all About Kids	10/0251/FUL approved. Renew as need more time to find alternate premises
Haywards Heath	North of 99 Reed Pond Walk Franklands Village Haywards Heath	18	18	531	Franklands Village Housing Association	Amended scheme from 10/01024/FUL. In negotiations within developer.
Haywards Heath	Burns House, Harlands Road, Haywards Heath	8	8	708	Whitehall Industrial LTD	No movement
Haywards Heath	6 Heath Sqare, Boltro Road, Haywards Heath	9	9	702	Ringstead One Limited	No movement
Hayward Heath	Penland Farm, Haywards Heath	210	210	247	Redrow	new full application pending decision
Haywards Heath	141 - 151 Western Road, Haywards Heath	14	14	199	Viva property development LTD	New permission
Haywards Heath	11 Boltro Road, Haywards Heath	7	7	334	Individual	No movement
Haywards Heath	Land between The Willows and Bennetts Rise, Haywards Heath	13	13	334	Providence Building Services	New permission
Hurstpierpoint	Sussex House, 23 Cuckfield Road, Hurstpierpoint	6	6	377	Individual	new application for 7 units pending DM/16/1565
Hurstpierpoint	Land to north of Hurstpierpoint	140	140	238	Bovis Homes	Permission July 2016
Hurstpierpoint	Land north of Highfield Drive, Hurstpierpoint	17	17	2	Rydon Homes	Applications to discharge conditions approved. BC plans approved.
Lindfield Rural	Buxshalls, Ardingly Road, Lindfield	19	19	586	Hanover Housing	Possible change to application to remove age occupancy
Lindfield	Springfield Farm, Lewes Road, Scaynes Hill	6	6	761	Individual	Further applications approved for external changes
Slaugham	Land at Caburn and St Georges House, Brighton Road, Handcross	7	7	704	Arunmoor (Handcross)LTD	Applications to discharge conditions approved and pending.
Slaugham	Seaspace House Brighton Road Handcross	7	7	321	Individual	no movement
Slaugham	Land at Hyde Estate, Handcross	90	90	517+647	Hallam and Hyde	Application for revised scheme expected
Slaugham	Sherwoods Works, Brighton Road, Handcross	7	7	762	Prospective Planning LTD	Application to discharge conditions pending.
Slaugham	Allotment Gardens, Handcross	6	6	709	Individual	No movement
Turners Hill	Clock Field, North Street, Turners Hill	47	47	488	Paddockhurst Estate	Reserved Matters approved
West Hoathly	Land adjacent to Cookhams, South of Top Road, Sharpthorne	16	16	477	unkwon	No movement, advised by Parish Council that expected in first 5 years.
Worth	Land at Holly Farm, Copthorne Way	45	45	268	Wates Developments	REM application submitted invalid
Worth	Palmers Autocentre Turners Hill Road Crawley Down	8	8	488	Budgen	Site cleared
Total			1132			

Resolution to grant permission subject to S106						
East Grinstead	Land south of Phoenix House, Cantelupe Road, East grinstead	12	12	746	Individual	Ctte Jan 2016, pending S106
Worth	Land north of A264 at Junction 10 of M23	500	300	38	Terence O'Rourke	S 106 due to be signed soon
Haywards Heath	L/A Larchwood, Anscombe Woods Crescent, Haywards Heath	10	10	334		S 106 due to be signed soon
Haywards Heath	Land at Gamblemead, Haywards Heath	99	99	57	Fairfax Acquisitions LTD	S 106 due to be signed soon
Haywards Heath	L/A Oldfield 55 Lewes Road, Haywards Heath	7	7	771	Cala Homes	S 106 due to be signed soon
Horsted Keynes	Ravenswood Hotel, Horsted Lane, Sharpthorne	12	12	728		S 106 due to be signed soon
	Total		440			
Allocations with no permission						
Ansty & Staplefield	North of Rookery Farm Rocky Lane Haywards Heath	55	55	94	Taylor Wimpey	DM/15/3553 pre app for 55 units
Burgess Hill	The Brow, Burgess Hill	100	100	756	MSDC	NP allocation MSDC laeding discussions with landowners
Turners Hill	Old Vicarage field, Turners Hill		44	492/553	Paddockhurst Estate	NP allocation
	Total		199			
Sites as identified in the Housing Supply Document						
Burgess Hill	Hook Place, Cuckfield Road, Burgess Hill		8	668		DM/15/5045 8 new homes resolution to grant permission
East Grinstead	Land adj to Greenstede House, Wood Street, East Grinstead		10	729	Eastmead Industries LTD	DM/15/4308 application for 11 units allowed on appeal
Haywards Heath	Hurst Farm, Hurstwood Lane, Haywards Heath		150	246	MSDC	MSDC owned site, allocated in emerging NP. Planning application expected Autumn 2016
Haywards Heath	Land to north of Rocky lane, Haywards Heath		30	30	Crest	DM/15/5107 resolution to grant May 2016
Haywards Heath	The Priory, Syresham Gardens, Haywards Heath		41	732	Lunar Office Sarl	DM/15/3508 for 41 units pending consideration
	Total		239			
Small sites with permission (with 30% discount)						
	Total		317			
District Plan Allocation						
Burgess Hill	North Burgess Hill		515	493	Various	First application submitted September 2016 140 units
Slaugham	Hardriding Farm, Parish Lane, Pease Pottage		150	666		DM/15/4711 application submitted Nov 2015 DM/15/4760 156 units
	Total		665			

APPENDIX 6

Q10: Completion rates on Greenfield sites

Land at Bylanes Close, Cuckfield	
42 units	
2013/14	2
2014/15	40

Manor Road, Burgess Hill	
122 units	
2011/2012	1
2012/2013	45
2013/2014	47
2014/15	29

Land rear of Ashplatts, East Grinstead	
117 units	
2012/13	16
2013/14	30
2014/15	46
2015/16	17
2016/2017 (oct)	8

West of Imberhorne Lane, East Grinstead	
100 units	
2013/14	23
2014/15	59
2015/16	18

Gravelye Lane, Lindfield	
65 units	
2012/13	33
2013/14	25
2014/15	7

Parcel Y, Fox Hill, Haywards Heath	
132 units	
2014/15	44
2015/2016	71
2016/2017 (oct)	17

Parcel X, Fox Hill, Haywards Heath	
90 units	
2011/12	46
2012/13	25
2013/14	15

2014/15	4
---------	---

Land to the east of Gravelly Lane and south of Scamps Hill, Lindfield	
230 units	
2014/2015	13
2015/16	59

Butlers Green Road, Haywards Heath	
40 units	
2015/16	40

Land at Woodlands Close, Crawley Down	
46 units	
2015/16	41

Land north of Malting Park, Burgess Hill	
94 units	
2013/2014	25
2014/15	26
2015/16	43

Bolnore Village, Phase 4a	
192 units	
2013/2014	54
2014/15	74
2015/16	28

Bolnore Village, Phase 4b	
181 units	
2015/2016	45

1.1.11.