Note to the Mid Sussex District Plan Examination from Mid Sussex District Council

8 December 2016

Summary

1. **This note provides a detailed supplement and response to some of the issues discussed in the initial three days of the Examination. It focuses on issues of existing evidence which the Council feels were not given sufficient weight or attention in the Examination sessions. As a consequence the Council is concerned that unsound conclusions could be reached.**

2. **Reflecting on the Examination to date, it is the view of the Council and its advisers that considerably more attention needs to be given to the sustainability and availability of housing sites and of the supporting evidence before any sound conclusions on provision can be reached. It is firmly of the view that any preliminary views expressed on housing numbers or housing needs are therefore partial.**

3. **Despite the requests from the Inspector, the experience of this week, and from a meeting between the Council and Forum representatives, is that the Developers Forum remains unwilling to give any substantive ground in order to agree a reasonable position with the Council or any of the wider stakeholders. The forum, instead rely on a highly selective and partial evidence base, which is without soundness or rigour and which reflects the biased objectives of a very narrow range of house builder interests.**

4. **Whilst accepting the principle of a simplified, step by step approach adopted by the Inspector so far, the Council is concerned with the robustness of the approach in practice. In particularly the Council feels that the method risks giving insufficient weight to the issues of sustainability and site availability and to the broader issues of capacity in the determination of housing requirements. This is, of course, especially relevant to the question of unmet needs.**

5. **The Council does not judge that an early review of the Plan is an appropriate way forward. After more than four years of evidence gathering and analysis, the Council suggests that a sound Plan exists if the evidence is examined <u>in full</u>. After the experience of the past few years the Council seeks certainty in the form of a robust Plan and sees limited benefit in taking forward the current Plan, if an early review is the consequence.**

6. **The Council does not accept the additional evidence recently submitted by the Forum in relation to OANs and suggested uplifts. The Council judges that far from engaging in a constructive process, the Forum has rather hardened its position on matters such as market signals and other economic adjustments.**

7. **The Council does not accept the position of severely worsening affordability, nor does it accept that any action taken by this Council alone will have any impact in real terms and believes that a targeted approach to improving affordability is appropriate. Overall affordability is a regional and national isse.**

8. **The Council judges that the recently submitted retrofit evidence from the Developers Forum related to affordability is based on an unsound mix of selective evidence, based on national rather than local factors without proper applied analysis of the economics of the housing market, market structure or likely market adjustment process.**

9. **The Council does not understand the rationale for any different treatment to other Districts within the HMA, particularly Horsham. Here affordability considerations remain similar and on some indicators worse. If different conclusions are to be reached on similar evidence and context to that before the Horsham Inspector, the Council requests an independent and justified rationale for any such conclusions, including why such considerations did not apply to Horsham.**

10. **Based on evidence, the Councils view is that the needs of Brighton and Crawley are already substantially reflected in the DCLG household projections. This is because moves from Brighton and Crawley are an established part of housing demand in Mid Sussex. Demand from these sources is also likely to be substantially reflected in market signals. The issue of unmet need is a sub-regional one and it is illogical and unsustainable for the burden or trigger mechanisms of sub-regional planning to be placed on a single authority. The Council is willing to play its part in meeting sub-regional needs on the basis of a comprehensively agreed sub-regional strategy and demonstrable and sustainable capacity.**

11. The remainder of this note is structured around our first response to these critical issues, focusing especially on the issue of sustainability and the supply of sites.

12. Attached Appendices also provide a response in relation to:

- Appendix A: Review of NLP analysis of market signals uplifts
- Appendix B: Further analysis of Unmet Needs and Market Signals
- Appendix C: Update on Common Ground on Affordable Housing
- Appendix D: Update on Common Ground on Employment Forecasts
- Appendix E: Update on Common Ground on Sites

Housing Site Supply

13. **It is the view of the Council and its advisers that considerable more attention needs to be given to the sustainability and availability of housing sites and of the supporting evidence for sites before any sound conclusions on provision can be reached. It therefore follows that any preliminary views expressed on housing numbers or housing needs are partial.**

14. The need to consider the sustainability and availability of sites arises because of the suggested uplift in requirements to reflect market signals which largely arise from the unmet needs of neighbouring areas. This is line with paragraph 20 of the NPPG which states that:

    "Market signals are affected by a number of economic factors, and plan makers should not attempt to estimate the precise impact of an increase in housing supply. Rather they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period".

15. A review is provided in Appendix A of the additional evidence that has been provided to the Council by the Developer's Forum on the case for additional provision to address affordability. This is largely a crude numerical analysis based on a partial analysis of the housing market, which continues to neglect the rather more detailed issue of increasing 'planned supply' in a way that can demonstrably improve affordability. However, the remainder of this first main section focuses on the rather critical issue of how this planned supply may be addressed.

16. As was fully evident from the session on 5 year supply against 800dpa held Thursday 1 December 2016, the existing 5 year land supply is very tight. The Council is left in a dilemma in which contributors to the discussion are very keen to increase housing numbers, but without any regard to a realistic assessment of sustainability or site availability and deliverability, or the effect on affordability that the possible range of additional provision would contribute. In particular the Council has not received any serious or robust analysis from the Forum or others, which suggests that there is a supply beyond 800dpa which is both sustainable and deliverable, or details of where such planned supply could be located to improve overall affordability.

17. The Council's position is that 800dpa remains the highest number that can be demonstrated to be soundly achieved based on existing site availability. The Forum's current position may be summarised as follows:

    - The Forum believes that based on provision 800 dpa, the Council is currently short of 209 dwellings to achieve an immediate five year land supply (based on the Sedgefield method). (The Council suggests that it has a surplus of 148 based on Liverpool). See Table 1 below.

- The Forum believes that the Council is short of 2,052 dwellings over the plan period (The Council accepts the shortfall is 793 dwellings over the plan period). See Table 2 below.

18. The difference between the Council and the Forum on the 5 year supply (Table 1) reflects a mostly un-evidenced view by the Forum on sites which are outside of Forum Members control; and a late reduction in the supply trajectory for the Northern Arc at Burgess Hill which was reported in the Council's response to the Inspector's housing supply questions submitted on 8th November (document MSDC2). Since the initial Examination the Council has received letters from developers confirming the delivery as suggested by the Council on two sites. These have been provided to the Forum and added to the examination library but, despite the Councils requests, it remains unclear as to whether this position is now finally accepted.

19. The position on overall supply across the plan period (Table 2) is largely influenced by the recent decision of developers Wates, Gleeson and Rydon to prefer lower density development at the Northern Arc at Burgess Hill which has the effect of reducing the claimed site capacity to just over 2,900 dwellings from the original 3,500 agreed initially with the Council. The Council considers such low densities at a key strategic site represent inefficient use of land. Higher densities are achievable without compromising the overall quality of development.

20. As noted in past submissions, the Council's suggested figure for provision at 800 dpa reflects both its own evidence base on the deliverability of sites within the first 5 years and concerns for the sustainability of any additional provision (expressed in summary as the 'tipping point' or 'planning balance'). It is a position which is robustly based, not one that has been merely 'convenient' for the Council. The sustainability position is firmly based on the effects and impact of additional sites that would be needed to meet any higher requirements and on the evidence of availability and deliverability. Further work is being undertaken to address this point in relation to the implications of going beyond the current position, as set out below.

21. Beyond the five year supply position at 800 dpa it is noted that the Forum (or other developers) has consistently been unable to supply the Council with a list of additional available and deliverable sites. This is despite the multiple calls for sites that have been made over the past couple of years which remain open for submissions or updated evidence. The Council's assessment of these sites in the form of site proformas has also been published on the Council's website for many months.

The Developers Forum Suggested 'Additional' Sites

22. Although the Forum submitted a list of its land interests at Appendix 1 of its submission in response to the Inspectors housing questions (Ref 1/ of 9 November) and suggested a split between allocated and unallocated sites, the Council suggest this is a misleading and incorrect analysis. This is because it does not take account of the sites' planning status in terms of planning permissions, status in District or Neighbourhood Plans or deliverability. Many of the Forum's suggested sites are already included as commitments

or are duplicates of existing SHLAA sites which have already been assessed and where there are known constraints, including AONB and Habitats considerations. See Annex 1 for an analysis of these sites.

23. The Forum's suggested list also includes sites which are the subject of live appeals and Secretary of State recovered appeals and call-ins, where the Council has lost jurisdiction. While the Council accepts on a balance of probabilities that some of these cases may be granted, it believes that it would be inappropriate for the Inspector to include these sites as part of any sound assessment of future supply, in advance of a decision by the Secretary of State. It would also be inappropriate for the Council to allocate these sites in the Plan as members of the Developers Forum have suggested.

24. Based on the Council's analysis of the sites proposed in Appendix 1 of the Forum submission Document 1/ (see Annex A), the Council notes that once sites that are already within the planning process are excluded, there is a maximum of 2,687 dwellings suggested that might be considered additional to those already at Planning Application stage or included in the 5 year land supply. However, the Council, does not judge that the sites which comprise the 2,687 dwellings are readily suitable for allocation. For example: the Thakeham site at East Grinstead (300 units), included in the 2,687 is within AONB, as is Hallam Land's sites at Handcross. Imberhorne Farm, East Grinstead (promoted by Welbeck) is also the only site on the Forum's list which would meet the criteria for possible allocation in the District Plan, based on the 500 unit threshold.

25. Even if hypothetically it is assumed that the equivalent of 2,687 dwellings could be allocated, comparison of this additional potential supply against the Forum's own suggested shortfall of 2,052 does not suggest any real additional or sustainable capacity. At any level, these suggested sites would certainly not suggest sufficient sustainable capacity to support any increase in overall housing numbers that would match the Forum's own suggested levels of growth.

26. The Council is also aware through other evidence that not all the available sites can be delivered in the first 5 years. For example, even if the significant and complex transport issues can be resolved at East Grinstead, this will take time and the Imberhorne Farm site is likely to deliver only a maximum of 150 units in the first 5 years, rather than 550 suggested by the Developer Forum.

27. The Council is actively seeking to reach common ground on the deliverability and 5 year supply position of the suggested additional capacity. The Council has shared its analysis of these sites and further requests to the Forum for the additional information on the overall status and delivery position of these sites is still outstanding. Until such analysis is forthcoming it is not practical to determine the basis of any additional claimed growth capacity.

Table 1: 5 Year Land Supply

Liverpool			
			Note
Requirement	MSDC	FORUM	
District Plan housing requirement 2015 - 2020	4,053	4,053	Based on residual amount of 11,754 divided over 14.5 years remaining of the Plan.
Annualised housing requirement with 20% buffer applied (years 1 -5 only)	4,864	4,864	4,034 x 20%
Supply			(Sites listed in Appendix 3)
Commitments			
Large sites where development has commenced	1,647	1,497	Residual amount.
Large sites with Planning permission where development has yet to commence	1,544	1,490	
Large allocated sites without planning permission	771	676	
Sites identified in the SHLAA	41	41	
Small sites with planning permission (with 40% discount applied)	304	304	
District Plan allocation at Burgess Hill	255	255	
District Plan allocation at Pease Pottage	450	450	
Total Housing Supply in year 1 - 5	**5,012**	**4,713**	
Five year supply	**5.15**	**4.84**	Total supply/Total requirement x 5
Surplus over period	148	-151	

Sedgefield			
			Note
Requirement	MSDC	FORUM	
District Plan housing requirement 2015 - 2020	4,000	4,000	800 annual requirement x 5 years
Shortfall in delivery year 14/15, 15/16	102	102	
	4,102	4,102	
Annualised housing requirement with 20% buffer applied (years 1 -5 only)	4,922	4,922	4,102 x 20%
Supply			(Sites listed in Appendix 3)
Commitments			
Large sites where development has commenced	1,647	1,497	Residual amount
Large sites with Planning permission where development has yet to commence	1,544	1,491	
Large allocated sites without planning permission	771	676	
Sites identified in the SHLAA	41	41	
Small sites with planning permission (with 40% discount applied)	304	304	
District Plan allocation at Burgess Hill	255	255	
District Plan allocation at Pease Pottage	450	450	
Total Housing Supply in year 1 - 5	**5,012**	**4,714**	
Five year supply	**5.09**	**4.78**	Total supply/Total requirement x 5
Surplus over period	90	-209	

Table 2 Overall Supply in the Plan Period

Updated Total Housing Requirement (November 2016) DP5 Housing		
	MSDC	**Forum**
Total housing requirement (2014 – 2031)	13,600	13,600
Supply		
Completions 2014/15	630	630
Completions 2015/16	868	868
Completions 2016/17 as at 1st October 2016	348	348
Existing Commitments		
Which is made up from :		
Neighbourhood Plan allocations, Local Plan Allocations and Small Scale Housing Allocations without planning permission	1,938	1,828
Large sites with planning permission (outstanding units on sites of 6 or more)	4,128	3,749
Small sites with planning permission (less than 6 units; total discounted by 40%)	304	304
Total Existing Commitments	6,370	5,881
Strategic development north and north-west of Burgess Hill (Policy DP9)	3,500	2,730
Strategic development at Pease Pottage (Policy DP9a)	600	600
Potential windfalls on site under 6 units	450	450
SHLAA sites (identified as deliverable within years 1 – 5)	41	41
Total Supply	12,807	11,548
Residual amount to be delivered through future Neighbourhood Plans and a Site Allocations Document (prepared by the District Council)	793	2,052

The SHLAA, Site Selection and the Sustainability Appraisal

28. The Council has conducted a very extensive call for sites and has been open to new information on sites for over 2 years. An analysis of all submitted sites has been included as individual proformas which are published on the Council's website, organised by Parish. The Council has welcomed feedback on these assessments at all stages, including proposals to overcome identified constraints. As previously noted the Council does not reasonably have the resources to undertake in depth studies to overcome these constraints, but has welcomed and evaluated additional submissions as these have been made. It has also monitored the progress of strategic sites.

29. The SHLAA findings have also provided evidence that has been available to Neighbourhoods Plans.

30. The conclusions of the existing submitted Sustainability Appraisal are based on the probable range of sites that would be required to meet a given level of growth and the cumulative effects of these sites. The SHLAA effectively ranks and categorises sites by constraints and uses this information to inform its judgment on overall sustainability. The information has informed the summaries of sustainability that have been submitted with the Plan.

31. As a separate exercise, and reflecting on the Inspector's initial comments, the Council is already revisiting its SHLAA and Sustainability Appraisal to determine the options in terms of the mix of probable sites and compromises that might be associated with any higher numbers beyond the suggested 800 dpa. This includes revisiting the original sustainability criteria and sub criteria that were used to inform the 'tipping point' or 'planning balance'.

32. It must be noted at this stage that for each additional 50 dwellings per annum, the Council would be required to identify an additional 850 units and at least an additional 250 units capable of delivery in the first 5 years (300 units when accounting for the 20% buffer). This also assumes that no additional sites are required to supplement the base position – the Forum's claim is that the Council is already short of 2,000 dwellings over the plan period and 209 in the first 5 years. Continuing the Council's agreed split between the District Plan and Neighbourhood Plans (i.e. the 500 strategic site threshold) suggests that, to achieve an increase to 850, the Council would need to find up to 6 additional strategic sites. It may also need to find approximately 500 units capable of delivery within the first 5 years.

	Mid Sussex Position		Developers Forum Position	
Plan Provision	**Additional Units 2014-2031** (compared to submitted District Plan)	**Additional Units required in years 1-5** (minimum, compared to submitted District Plan[1])	**Additional Units 2014-2031** (compared to submitted District Plan)	**Additional Units required in years 1-5** (minimum, compared to submitted District Plan[2])
850	850 (1-2 additional strategic sites)	250	2,850 (5-6 additional strategic sites)	483
900	1,700 (3-4 additional strategic sites)	500	3,700 (7-8 additional strategic sites)	733
950	2,550 (5 additional strategic sites)	750	4,550 (9 additional strategic sites)	983
1000	3,400 (6-7 additional strategic sites)	1000	5,400 (10-11 additional strategic sites)	1,233

Future Strategy Including Review Mechanisms

33. The Council's objective is to be in line with paragraph 14 of the NPPF and it is reviewing potential capacity to allow it to meet the level of needs consistent with the principle of sustainable development. It judges that this assessment may be completed in the next few weeks and does not want this to be the basis of any further delay. As suggested above the current identified supply position is tight, particularly for the first 5 years and shortfalls are not addressed by the unsatisfactory information on 'site interests' that have been submitted by the Forum to date in its submission on housing matters. Until such time as sustainable capacity is identified and properly considered, the Council does not judge that it is possible to reach conclusions on objectively assessed needs, adjustments to address market signals and unmet need and overall plan provision.

34. The Council is considering options in terms of providing additional strategic guidance for future neighbourhood plan reviews.

35. The Council believes it is too soon to determine whether a smooth or stepped requirement is possible and that this should depend on sustainable capacity, once it is agreed. Similarly while the Council is keen to play it proper role in providing an adequate supply of housing to meet housing need within the HMA, it believes that this must be on the basis of similar considerations.

36. In addressing 'unmet need' the Council has regard to the position expressed by Crawley at the Examination on 1 December 2016 that its own needs can be met in the short term (5 years) a position it has consistently maintained. For example in its consultation

[1] Minimum, not accounting for under-supply in years 2014/15 and 2015/16, and 20% buffer.
[2] Minimum, not accounting for under-supply in years 2014/15 and 2015/16, and 20% buffer.

response to the Pease Pottage application to Mid Sussex by Mr Clem Smith of Crawley Council, it states at paragraph 4.1.2 of the letter[3]:

"In respect of Crawley's housing supply, the Housing Trajectory confirms that the housing need for the Borough can be met in the short term (5 years) from existing commitments within the town and around its boundaries from sites including Kilnwood Vale, land at Rusper Road and west of Copthorne (a total in excess of 3,000 dwellings) however there is significant decline in sites with development potential identified beyond 2024/25".

37. In relation to review mechanisms the Council suggest that the issues of the sub region and in particular the unmet needs of Brighton and Hove can only be met through a proper sub regional planning exercise, which could also consider the role of any long term strategic allocations and new settlements, in addition to those suggested by Mayfield Market Towns. It follows that any review of the Plan should reflect this sub regional exercise.

38. The Council's approach is influenced by the conclusions of the Horsham Inspector who concluded in his report at paragraph 53[4]:

"A joint approach involving all the relevant Councils is required on a co-operative basis to fully address the OANs of at the very least the three Council areas in one overall SHMA and possibly to include consideration of other updated needs outside the SHMA, including those of the coastal area authorities and possibly London. It is appropriate for this Plan to proceed on that basis, provided that there is a firm commitment from the Council to play its part in addressing the needs of the wider area as part of an early review of the HDPF, as required by MM2" .

39. The Council seeks to agree a reasonable position on housing provision based on paragraph 20 of the the NPPG and will continue to monitor the position of the HMA and wider area in line with policy. The Council does not judge that an early review of the Plan is an appropriate way forward. After more than four years of evidence gathering and analysis, the Council suggests that a sound Plan exists if the evidence is examined in full. After the experience of the past few years the Council seeks certainty in the form of a robust Plan and sees limited benefit in taking forward the current Plan, if an early review is the consequence.

40. The council recognises that the overall supply position is tight and continues to commit to a further site allocations DPD as set out previously.

[3] Letter of 5 February 2016 from Mr Clem Smith, included in Documentation related to the Planning Application, Ref RD2 in the Examination Library.
[4] Horsham Inspector's Report, 2015

Annex 1: Forum Site analysis

Company	Site Interest (Name and Location)	Greenfield/ Brownfield	Site Area	Estimated Dwelling	SHLAA ID	Comments	Units not already in planning system	Suggested 5 year supply from the Developer Forum Submission
Barratt Homes	Chalkers Lane, Hurstpierpoint (under construction)	Greenfield	3.77ha (9.3 acres)	61 units	284	Under construction 24 remain		
	Heathwood Park (Phase 2), Langmore lane, Lindfield (under construction – JV with Wates)	Greenfield	13.9ha (34.3 acres)	230 units	494	Under construction 147 remain		
	Land at Mackie Avenue, Hassocks (Freehold)	Greenfield	6.64ha (16.4 acres)	140 units	753	Allocated in Submitted NP	140	
Countryside	Bolney Road, Ansty	Greenfield	2.2ha (5.4 acres)	50 units	629	Part allocated in NP for 18 units	32	
Welbeck Land	Land West of Imberhorne Lane, Imberhorne Lane East Grinstead	Greenfield	51ha (126 acres	550 units	562	Promoted to Council since early 2016. Assessed in SHLAA – not suitable Highway reasons	550	
Gleeson	London Road, Hassocks	Greenfield	5.3ha (13.1 acres)	97 units	286	At appeal (to be re-determined)		
	Burgess Hill West Site (part of the Northern Arc) (Jointly controlled with Rydon Homes)	Greenfield	98 ha (242.2 acres)	1,360 units		DP allocation		
	Land at Hazel Close, Crawley Down	Greenfield	2.71ha (6.7 acres)	60 units	281	Res to grant (call –in)		
	Land north of Hassocks	Greenfield	20ha (49.4 acres)	140 units	221	Res to grant (call-in)		

	Lindfield	Greenfield	5.7ha (14.1 acres)	100 units	498 (part)	Assessed in SHLAA – not suitable – multiple reasons	100	
Hallam Land	Land at Horsham Road, Handcross		6.63ha (16.38 acres)	100 units	181	Assessed in SHLAA – not suitable AONB	100	
	Retained land at Handcross		0.34ha (0.85 acres)	15 units	Part of site with Planning permission 517+647			
	Existing Parish Hall site, Handcross		0.41ha (1.01 acres)		Part of site with Planning permission 517+647			
Linden Homes	Hill Place Farm, East Grinstead		~8.7ha (21.5 acres)	200 units	562	At Appeal, pending decision		
Redrow	Penlands Farm, Balcombe Road, Haywards Heath		21.7ha (53.6 acres)	210 units	247	Planning permission		
Reside Developments Ltd	Land east of High Beech Lane, Lindfield		2.27ha (5.6 acres)	50 units	151	Current planning application		
	Other in Mid Sussex		6.0ha (15 acres)	150 units	76	Assessed in SHLAA - not suitable landscape	150	
Rydon Homes Limited,	Freeks Farm, Northern Arc, Burgess Hill.		19ha (47 acres)	450 units		DP allocation		
	Bridge Farm, Northern Arc, Burgess Hill		3.2ha (7.9 acres)	1,118 units		DP allocation		
	Collins South, Northern Arc, Burgess Hill.		14ha (34.6 acres)			DP allocation		
	Paynes Place Farm, Northern Arc, Burgess Hill.		22.59ha (55.8 acres)			DP allocation		
	Lowlands Farm, Northern Arc, Burgess Hill		14.88ha (36.8 acres)	100 – 150 Units		DP allocation		
	Land r/o Friars Oak, Hassocks		10.51ha (26 acres)	130 units	221	Res to grant (call-in)		

Taylor Wimpey	Land to the east of Gravelye Lane, Lindfield		6.64ha (16.4 acres)	130 units	6	At appeal		
Thakeham Homes	Pease Pottage (option)		59ha (145.8 acres)	600 units	666	Current planning application		
	East Grinstead (option)		48.5ha	300 units	17	Assessed in SHLAA	300	
	Burgess Hill, Western Arc (Promotion agreement)		75ha (185.3 acres)	1500 units		DP allocation		
	Hurstpierpoint (a) (option)		4ha (9.9 acres)	80 units		Unknown	80	
	Hurstpierpoint (b) (freehold)		8ha (19.8 acres)	90 units	19	Assessed in SHLAA Dismissed at appeal	90	
Village Developments	Hurst Farm, Crawley Down		3.34ha (8.3 acres)	75 units	743	Assessed in SHLAA – excluded	75	
	Florin Farm, Crawley Down		5ha (12.4 acres)	55 units	12	Assessed in SHLAA - excluded Subject to planning applications previously refused at appeal	55	
	Landfall House, Crawley down		4ha (9.9 acres)	15 units	No SHLAA submission	Detached from BUA	15	
	Keepers Knight, Copthorne		9ha (22.2 acres)	200 units	18	Assessed in SHLAA of part of larger site Crabbet Park	200	
	Pakyns Farm/Pakyns Cottage, Albourne Road, Hurstpierpoint		2ha (4.9 acres)	45 units	Not in SHLAA	Detached from BUA	45	
	Foxhole Farm and buildings		2ha (4.9 acres)	40 units	617	Assessed in SHLAA – developable (13 ha) 11+ and NP not allocated	40	
	Foxhole Farm Phase 1 with school (SHLAA site for 180)		7ha (17.2 acres)	145 units			145	
	Foxhole Farm phase 2 (balance of land)		12ha (29.7 acres)	360 units			360	
Wates	Heaselands, Northern		57.38 ha	1,110 units		DP allocation		

Developments Ltd	Arc, Burgess Hill - Land Promotion Agreement.		(141.79 acres)					
	Lindfield, Land South of Scamps Hill Road – Land Promotion Agreement.		24.66 ha (60.93 acres)	200 units	483	At appeal		
	Crawley Down, Turners Hill Road – Freehold.		1.09 ha (2.70 acres)	10 units	271	At appeal		
	Crawley Down, Turners Hill Road – Option Agreement.		3.28 ha (8.10 acres)	34 units				
	Crawley Down, Turners Hill Road – Option Agreement.		36.42 ha (90.0 acres)	150 units	688	Assessed in the SHLAA – not suitable scale, landscape	150	
	Felbridge, Crawley Down Road – Option Agreement		2.59 ha (6.40 acres)	60 units	197	Assessed in the SHLAA – not suitable access	60	
			Sub total units	**10,575**				
			Minus district plan allocations	**-3,600**				
			Total	**6,975**			**2,687**	

Appendix A: Review of Additional Evidence Submitted by NLP to support a suggested market uplift

Appendix A: Review of Additional Evidence Submitted by NLP to support a suggested market uplift

Context

1. The Council has recently received a note on market signals prepared by NLP. It seeks to respond to a request from the Inspector for the forum to justify its suggested 25% market signals uplift within Mid Sussex District alone in the wider HMA. This follows initial remarks in the form of an effective hypothesis set by the Inspector that while he felt that the Council's initial position might be the low side, he was unconvinced of the Forum's case for a 25% increase in provision was fully justified. The additional evidence also reflected concerns expressed by the Council that the effect of any uplift on affordability needed to be clearly justified to be in line with the NPPG, which at paragraph 020 states:

    "Market signals are affected by a number of economic factors, and plan makers should not attempt to estimate the precise impact of an increase in housing supply. Rather they should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability, and monitor the response of the market over the plan period".

2. Paragraphs 47 and 159 of the NPPF indicates the need for a Housing Market Area approach to assessing housing needs, rather than the Mid Sussex specific approach adopted by the Forum's recent and new analysis.

3. The Council has already submitted its own evidence on the affordability issues based on analysis at a local level (including adjacent and nearby authorities) including those within the same Housing Market Area; the position of the respective authorities within it; and the experience of other plans which have been tested within the HMA area. In terms of demography, geographic location and scale, the greatest similarities can be found with Horsham. For convenience of presentation this is summarised at Appendix B of this statement, which also adds further analysis of Arun as a further similar neighbouring authority, and where initial conclusions on the need or otherwise for an uplift in affordability have been recently drawn.

4. In reviewing similar evidence within the HMA, the Horsham Inspector report, concluded the following in relation to affordability at paragraphs 36 and 37 of his report:

    36. The relative position of house prices in Horsham compared with the HMA and regional and national trends is unchanged; over the period from 1998 to 2007 they have increased by similar percentages in all areas. Since 2007, Horsham house prices have again followed regional and national trends, showing notable price falls to 2009 and relatively flat indicators since. Sales volumes show

> *a similar picture in recent years, with dramatic falls in 2008, from which they have just recovered, somewhat faster than the national average. Price/income ratios in Horsham remain just below the peak levels found in 2007 and until the last 18 months have been little changed. Absolute rises are similar to those in Mid Sussex, although affordability issues in Crawley are not so severe.*
>
> *37. Since 2006/07 completions data in Horsham and across the HMA fell well short of the former South East Plan target, although there has been a marked pick up over the last two years, again reflecting improved market conditions. The initial slow pace of development on major development sites west of Crawley during the recession clearly had a significant impact on these figures. The Council have included a modest upwards adjustment in their OAN figure of 22 dpa to account for affordability pressure in the 25-34 age group, evidenced by substantial growth in private rented sector accommodation and the number of persons in HMOs, even though these indicators are again in line with HMA and national trends. I consider 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 virtually all of the south east. The Council's modest increase appears appropriate therefore[5].*

5. The Council has been consistently been led to believe that the Planning Inspectorate now offers an improved 'joined up' approach in the way it deals with cases. It has also been led to believe that it should derive a reasonable degree of certainty of approach from the experiences of other Plan's within its Housing Market Area.

6. In contrast to this HMA-consistent analysis and conclusions, the position of the Forum is that Mid Sussex alone should make an arbitrary 25% uplift with the claimed effect of improving affordability. In relation to this claim the Council and its advisers note the following initial reactions in relation to the recent analysis produced by NLP, based on the limited time available to review:

    - There is no evidence that an increase on this scale or any other colossal increase in single local authority has ever led to improvements in affordability.

    - There is no basis for Mid Sussex 'going it alone' in addressing a regional scale affordability issue, let alone addressing the issue of sustainability suggested by paragraph 20 of the NPPG.

    - It is not clear why 25% would be effective as the NLP analysis, suggests a much higher figure may be required to improve affordability. There is no evidence that such a 'gesture', if that is what is suggested, would have any effect in terms of the objective of reducing affordability.

[5] Para 36 and 37 Horsham District Planning Framework, Inspector's Report, October 2015

7. The Council and its advisers have very obvious severe concerns as to the validity of the suggested approach and considers it unsound. In particular, based on a review in the limited time available:

    - The analysis is without intellectual or academic precedent at this local scale within a wider functional housing market, and is fundamentally economically invalid and misleading.

    - If such a methodological approach is to be established there is a need for wider agreement as to the accepted approach at this scale and potentially wider peer review.

    - The analysis appears to apply assumptions, such as supply and price elasticities derived at larger and national scales to a local context, which is totally invalid.

    - The implicit use of ‘comparative statics’ a kind of ‘before and after approach’ fails to consider the dynamic adjustments within an imperfect market and the unpredictability, nature or timescale of local market response.

8. Overall it is the Council’s view that the Forum has not proved its case for a 25% uplift to improve affordability through any of the NLP analysis. The Council remains committed to an uplift in line with the approach adopted in Horsham.

Use of Comparator Areas

9. The Forum (and representations made by others) also provide examples of percentage uplifts applied elsewhere in the country to address market signals. These generally range between 10-25% dependant on the perceived levels of affordability pressure. Notably those areas with low or zero uplift for market signals are excluded from this assessment, many which have the benefit of being found ‘sound’ through examination.

10. Direct comparisons between Mid Sussex and the ‘10-25%’ authorities cannot be made as there are too many factors affecting affordability which may not be similar; or by virtue of their location and authority size comparisons would not be on an equal basis. However, It is the Councils view that direct comparisons can be made with three authority areas:

    - Crawley, as an immediate neighbour within the same Housing Market Area;

    - Horsham, as an immediate neighbour within the same Housing Market Area, similar in spatial and demographic scale: and

    - Arun, within the South-East region and using the same methodology as Mid Sussex.

11. All three authorities additionally share an identical methodology with respect to market signals. Both Horsham and Crawley have been found sound and are now

adopted, and Arun has been examined with the Inspector's initial conclusions on Objectively Assessed Need published. A full summary analysis of these valid comparators is provided in Appendix B.

Appendix B: Market Signals and Unmet Needs

Appendix B: Unmet Needs and Market Signals

The Council's analysis of Market Signals

1. Paragraphs 47 and 159 of the NPPF indicates the need for a Housing Market Area approach to assessing housing needs, rather than the Mid Sussex specific approach adopted by the Forum's recent and new analysis.

2. As noted above the Horsham Inspector's report of 2015, concluded the following in relation to affordability at paragraphs 36 and 37:

> *36. The relative position of house prices in Horsham compared with the HMA and regional and national trends is unchanged; over the period from 1998 to 2007 they have increased by similar percentages in all areas. Since 2007, Horsham house prices have again followed regional and national trends, showing notable price falls to 2009 and relatively flat indicators since. Sales volumes show a similar picture in recent years, with dramatic falls in 2008, from which they have just recovered, somewhat faster than the national average. Price/income ratios in Horsham remain just below the peak levels found in 2007 and until the last 18 months have been little changed. Absolute rises are similar to those in Mid Sussex, although affordability issues in Crawley are not so severe.*
>
> *37. Since 2006/07 completions data in Horsham and across the HMA fell well short of the former South East Plan target, although there has been a marked pick up over the last two years, again reflecting improved market conditions. The initial slow pace of development on major development sites west of Crawley during the recession clearly had a significant impact on these figures. The Council have included a modest upwards adjustment in their OAN figure of 22 dpa to account for affordability pressure in the 25-34 age group, evidenced by substantial growth in private rented sector accommodation and the number of persons in HMOs, even though these indicators are again in line with HMA and national trends. I consider 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 virtually all of the south east. The Council's modest increase appears appropriate therefore[6].*

3. The Council has been consistently led to believe that the Planning Inspectorate now offers an improved 'joined up' approach in the way it deals with cases. It has also been led to believe that it should derive a reasonable degree of certainty of approach from the experiences of other Plan's within its Housing Market Area.

[6] Para 36 and 37 Horsham District Planning Framework, Inspector's Report, October 2015

4. In the light of these findings within the North West Sussex HMA, the Council seeks to understand the rational basis for not treating Mid Sussex in a similar way to Horsham.

5. Accordingly, the Council has made a further review of the market signals evidence comparing the Mid Sussex position (an uplift of 24dpa) with nearby comparison authorities. Horsham and Arun in particular use an identical methodology to Mid Sussex and applied uplifts of 22dpa and 26dpa respectively, despite market signals evidence within their housing need assessments showing a less favourable position than Mid Sussex for most if not all indicators. The Council are therefore confident that, in order to avoid unjustified and unsound inconsistencies with other recently found sound plans within the same housing market and geographic area, the uplift of 24dpa is a relevant and robust approach.

6. The review focuses on Crawley, Horsham and Arun – these authorities have used the same methodology and calculation to Mid Sussex. They are also the most obviously relevant comparison authorities by virtue of their size and location.

7. A review of the data sources used in each authorities' housing needs assessment shows that each comparative authority has drawn market signals information from the same data sources, the majority using the same timescales/source dates. In particular, the three Northern West Sussex HMA authorities use (in the majority of cases) the same data as previous evidence base work was undertaken on a joint basis. This is shown in Table 4.

8. Based on these data sources, Mid Sussex shows similar or better market signals than Horsham for nearly every indicator. Mid Sussex fares equal or better on indicators related to rents, overcrowding, concealed households and homelessness acceptances than Horsham, Arun and Crawley. Table 5 presents a ranking of authorities based on the various market signals indicators.

9. As each authority has used the same data sources direct comparisons can be made. Mid Sussex fares better than Horsham and Arun for most if not all indicators. Given the same methodology and data has been used by each authority, and Arun/Crawley/Horsham have all had their methodologies found 'sound', it logically follows that the 24dpa uplift proposed by Mid Sussex is justified and consistent with approaches made in the same Housing Market Area and wider region.

Table 4 – Market Signals Data Sources

Market Signal	Mid Sussex	Source	Ref	Crawley	Source	Ref	Horsham	Source	Ref	Arun	Source	Ref
	Housing and Economic Development Needs Assessment (Feb 2015) (MSDC) AHNM 2014 (Chilmark) and NWS AHNM (2014)			**Objective Assessment of Crawley's Housing and Employment Needs (Feb 2015) and NWS AHNM 2014**			**Housing Need in Horsham District – March 2015 – GL Hearn and NWS AHNM (2014)**			**Objectively Assessed Need for Housing: Arun District (March 2015)**		
House Price trends	Median House Prices at Quarter 2, 2013	CLG Table 582, June 2014	Fig 1	Median House Prices, Crawley Borough and NW Sussex HMA, Q2 2013	CLG Table 582, June 2014	Fig 4.1 (Fig 1)	Median House Prices at Quarter 2, 2013	CLG Table 582, June 2014	Fig 1			
	Median House Price 2012	CLG Table 586, June 2014	Table 15									
Median House Price Trends	Median House Price Trends, 1996 – 2013	HM Land Registry	Fig 11 (Fig 2)	Median House Price Trends, 1996 – 2013	HM Land Registry	(Fig 2)	Median House Price Trends, 1996 – 2013	HM Land Registry	(Fig 2)			
							Median House Price Change 1998-2007	DCLG Live Tables: Land Registry Data	Fig 12	Median House Price Change 1998-2007	DCLG Live Tables: Land Registry Data	Fig 20
	Median House Price Trends, by quarter - 1996 – 2013	CLG Table 582, June 2014	Fig 12	Median House Price Trends, 1996 – 2013 (by quarter)	CLG Table 582, June 2014	Fig 4.2	Median House Price Change 2008-2013	DCLG Live Tables: Land Registry Data	Fig 13	Median House Price Change 2008-2013	DCLG Live Tables: Land Registry Data	Fig 21
Price Inflation	Annual House Price Inflation, Northern West Sussex Authorities, 1997 – 2012	CLG Table 586, June 2014	Fig 13 (Fig 3)	Annual House Price Inflation, Northern West Sussex Authorities, 1997 – 2012	CLG Table 586, June 2014	(Fig 3)	Annual House Price Inflation, Northern West Sussex Authorities, 1997 – 2012	CLG Table 586, June 2014	(Fig 3)			
	House Price Appreciation, Annualised, Northern West Sussex HMA	CLG Table 586, June 2014	Fig 4	House Price Appreciation, Annualised, Crawley Borough and Northern West Sussex HMA	CLG Table 586, June 2014	Fig 4.3 (Fig 4)	House Price Appreciation, Annualised, Northern West Sussex HMA	CLG Table 586, June 2014	Fig 4			
	House Price Appreciation, 2002-2012 (all adj. authorities etc.)	CLG Table 586, June 2014	Fig 14/15									
							Median House Prices (2013 - 2014) (by property type)	GLH Analysis: Land Registry Price Paid Data	Fig 15	Median House Prices Jan 2013-Nov 2014 (by property type)	GLH Analysis: Land Registry Price Paid Data	Fig 22
	Average House Prices by Type, 2014	TPDL, 2014; ONS House Price Table 512, 2014	Table 4	Average House Prices by Type, 2014	TPDL, 2014; ONS House Price Table 512, 2014	Table 4	Average House Prices by Type, 2014	TPDL, 2014; ONS House Price Table 512, 2014	Table 4			
	Change in Average House Prices 2014 Compared to SHMA Update 2012 (Table 3)	TPDL, 2014; ONS House Price Table 512, 2014 Table 4 and SHMA 2012 Update, Table 3	Table 5	Change in Average House Prices 2014 Compared to SHMA Update 2012 (Table 3)	TPDL, 2014; ONS House Price Table 512, 2014 Table 4 and SHMA 2012 Update, Table 3	Table 5	Change in Average House Prices 2014 Compared to SHMA Update 2012 (Table 3)	TPDL, 2014; ONS House Price Table 512, 2014 Table 4 and SHMA 2012 Update, Table 3	Table 5			
	Percentage House Price Growth by Type, 2011 – 2014	TPDL, ONS and CCL Calculation, 2014	Fig 5	Percentage House Price Growth by Type, 2011 – 2014	TPDL, ONS and CCL Calculation, 2014	Fig 5	Percentage House Price Growth by Type, 2011 – 2014	TPDL, ONS and CCL Calculation, 2014	Fig 5			

Sales trends	Sales Transactions Completed in Northern West Sussex, Q1, 1996 to Q2, 2013	CLG Live Table 584, 2014	Fig 6	Sales Transactions Completed in Northern West Sussex, Q1, 1996 to Q2, 2013	CLG Live Table 584, 2014	Fig 6	Sales Transactions Completed in Northern West Sussex, Q1, 1996 to Q2, 2013-	CLG Live Table 584, 2014-	Fig 6			
										Proportion of Sales by Dwelling Type Jan 2013 – Nov 2014)	GLH Analysis: Land Registry Price Paid Data	Fig 23
	Total Sales Transactions, Northern West Sussex HMA, 2009 – 2012	CLG Live Table 584, 2014 and CCL Calculation	Fig 7	Total Sales Transactions, Northern West Sussex HMA, 2009 – 2012	CLG Live Table 584, 2014 and CCL Calculation	Fig 7	Total Sales Transactions, Northern West Sussex HMA, 2009 – 2012	CLG Live Table 584, 2014 and CCL Calculation	Fig 7			
				Housing Sales Transactions 2012 – 2014, Crawley Borough	TPDL HMLR data for 2013 and 2014 and CCL calculation	Table 4.3	Indexed Analysis of Sales Trends 1998 – 2014 (sales volumes)	HMLR/ DCLG Live Tables, Land Registry Data	Fig 14	Indexed Analysis of Sales Trends 1998-2014 (sales volumes)	DCLG Live Tables and VOA Data	Fig 24
				Mean Average House Prices by Type Crawley, South East Region and England, June 2014	TPDL, 2014; ONS House Price Table 512, 2014.	Table 4.1 (Table 4)						
				Mean Average House Prices and Six Monthly Change, Crawley Borough, June 2014 and January 2015	TPDL Data, extracted January 2015 and CCL calculation	Table 4.2						
Rental Trends Price inflation	Index of Private Rental House Price Growth, 2005 – 2014 (by region)	VOA, Private Housing Rental Prices Index, March 2014	Fig 21 (Fig 13)	Index of Private Rental House Price Growth, 2005 – 2014 (by region)	VOA, Private Housing Rental Prices Index, March 2014	Fig 13	Index of Private Rental House Price Growth, 2005 – 2014 (by region)	VOA, Private Housing Rental Prices Index, March 2014	Fig 13			
				Index of Private Rental House Price Growth, Q1 2005 – Q3 2014 (region)	VOA, Private Housing Rental Prices Index,	Fig 4.4	Benchmarked trend in median private rental values (2011-2014)	VOA Private Rental Data	Fig 16	Benchmarked trend in average private rental values Sep 2011 – Sep 2014 (includes LA level)	VOA Private Rental Data & ONS	Fig 25
Volume	Annual Private Rental Lettings for Northern West Sussex Authorities, Q2, 2010 – Q1, 2014	VOA, 2010 - 2014	Fig 12	Annual Private Rental Lettings for Northern West Sussex Authorities, Q2, 2010 – Q1, 2014	VOA, 2010 - 2014	Fig 12	Annual Private Rental Lettings for Northern West Sussex Authorities, Q2, 2010 – Q1, 2014	VOA, 2010 - 2014	Fig 12			
	Annual Private Rental Lettings Q2, 2010 – Q1, 2014 (transactions) (detailed)	VOA Lettings Administrative Information Database, 2010 – 2014	Table 17/ Fig 20				Trend in private rental transactions (2011 - 2014)	VOA Private Rental Data	Fig 17	Trend in Private Rental Transactions Sep 2011 – Sep 2014	VOA Private Rental Data	Fig 26
	Private Rental Costs Compared to Average Monthly Mortgage Costs, 2014	VOA, Money Supermarket Mortgage Calculator and Consultants CCL Calculation	Table 18 (Table 8)	Private Rental Costs Compared to Average Monthly Mortgage Costs, 2014	VOA, Money Supermarket Mortgage Calculator and Consultants CCL Calculation	Table 8	Private Rental Costs Compared to Average Monthly Mortgage Costs, 2014	VOA, Money Supermarket Mortgage Calculator and Consultants CCL Calculation	Table 8			

	Median monthly rent Q2, 2010 – Q1, 2014	Source: ONS - Private Rental Market Statistics	Table 19									
Affordability of Market Housing	Ratio of Lower Quartile Prices to Lower Quartile Earnings, 2009 – 2013	DCLG Table 576	Table 16	Ratio of Lower Quartile Prices to Lower Quartile Earnings, Crawley Borough in Comparison to NW Sussex HMA Authorities	CLG Live Table 576, 2014	Fig 4.7	Lower Quartile Affordability Trend (1997-2013)	CLG Housing Market Live Tables	Fig 18	Lower Quartile Affordability Trend 1997 – 2013	DCLG Housing Market Live Tables	Fig 27
	Ratio of Lower Quartile Prices to Lower Quartile Earnings, 2009 – 2013	CLG Live Table 576, 2014	Fig 8	Ratio of Lower Quartile Prices to Lower Quartile Earnings, 2009 – 2013	CLG Live Table 576, 2014	Fig 8	Ratio of Lower Quartile Prices to Lower Quartile Earnings, 2009 – 2013	CLG Live Table 576, 2014	Fig 8			
	Ratio of Lower Quartile Prices to Earnings, 1997 – 2013	CLG, Live Table 576, 2014	Fig 18 (Fig 9)	Ratio of Lower Quartile Prices to Earnings, 1997 – 2013	CLG, Live Table 576, 2014	Fig 4.8 (Fig 9)	Ratio of Lower Quartile Prices to Earnings, 1997 – 2013	CLG, Live Table 576, 2014	Fig 9			
	Ratio of Lower Quartile Prices to Earnings, 1997 – 2013 (SE/WS/Comparative authorities)	CLG, Live Table 576, 2014	Fig 19									
	First Time Buyer House Price to Earnings Ratio, South East, London and UK	Nationwide, 2014	Fig 10	First Time Buyer House Price to Earnings Ratio, South East, London and UK	Nationwide, 2014	Fig 10	First Time Buyer House Price to Earnings Ratio, South East, London and UK	Nationwide, 2014	Fig 10			
	Mortgage Re-Payments to Household Incomes	Nationwide, 2014	Fig 11	Mortgage Re-Payments to Household Incomes	Nationwide, 2014	Fig 11	Mortgage Re-Payments to Household Incomes	Nationwide, 2014	Fig 11			
	Proportion of new households unable to purchase or rent without assistance 2009, 2012, 2014	2009 SHMA, 2012 SHMA Update; 2014 AHNU	Fig 17				Comparison of lower quartile and median affordability (2013)	CLG Housing Market Live Tables	Fig 19	Comparison of Lower Quartile and Median Affordability (2013)	DCLG Housing Market Live Tables.	Table 23
										Comparison of Gross Annual Earnings for Full Time Workers, 2013	NOMIS Annual Survey of Hours and Earnings	Fig 28
							Change in Households by Tenure in HMA, 2001-11 (owner occupation)	2001 & 2011 Censuses	Fig 20	Change in Households by Tenure, 2001-11 (owner occupation)	2001 & 2011 Censuses	Fig 29
Rate of development	Permissions granted, dwellings completed and stock of commitments 2004-2014	WSCC/ MSDC Monitoring and MSDC Monitoring Report	Table 21	Crawley Borough Annual Net Housing Completions	CBC Annual Monitoring Reports and Local Plan, Topic Paper 2, November 2014	Fig 4.5	Housing Supply vs. Past Targets, 2006/07 – 2013/14	Local Authorities' Annual Monitoring Reports	Fig 21	Housing Supply vs Past Targets 2006/07 – 2012/13	Authority Monitoring Reports	Fig 30
				Net Annual Additions to Total Housing Stock, Crawley and Northern West Sussex Authorities, 2004/5 – 2013/14	DCLG Live Table 122, January 2015	Fig 4.6						

Overcrowding	Overcrowding, 2001 and 2011 (Occupancy Rating - rooms)	2001 / 2011 Census	Table 22	Change in Over-Occupation Levels, 2001 - 2011	2001 and 2011 Census, CCL calculation	Table 4.4	Changes in Over Occupied and Houses in Multiple Occupation (2001-2011)	2001 & 2011 Censuses	Tabl e 9	Changes in Over Occupied and Houses in Multiple Occupation, 2001-2011	2001 & 2011 Censuses	Table 24
	Overcrowding by Tenure, 2001 and 2011 (Occupancy Rating)	Census 2001, 2011	Table 23									
Concealed Households	Concealed households 2001-2011	Census 2001, 2011	Table 24									
Homelessness	Number of homelessness acceptances per 1,000 households - 2004-2014	CLG Live Table 784	Figure 24 / Table 25									

Table 5 - Ranking of Authorities based on Market Signals Indicators

Rank (ranked 1= worse to 17= better)	House Prices		Affordability (market housing)		Rents		Overcrowding		Concealed households		Homelessness	
	Median (2013)	Appreciation 2002-2012	Ratio (LQ earnings to LQ house prices) (2013)	Change (2003-2013)	Median monthly rent 2014	Change% Q2, 2010 – Q1, 2014	% (all) homes over-occupied (2011)	Change (all homes) (2001-2011)	% (all) families concealed	Change (2001-2011)	Homeless acceptances 2013-14	Change homeless acceptances 2004/05 - 2013/14[7]
1	Tandridge	Brighton & Hove	Tandridge	Tandridge	Tandridge	Crawley	Brighton & Hove	Brighton & Hove	Crawley	Crawley	Crawley	Chichester
2	Reigate & Banstead	England	Chichester	Lewes	Brighton & Hove	Reigate & Banstead	Crawley	Crawley	England	Arun	Brighton & Hove	Lewes
3	Horsham	Worthing	Horsham	Horsham	Reigate & Banstead	Tandridge	Worthing	Worthing	Chichester	Chichester	England	Horsham
4	Chichester	Chichester	Mid Sussex	Reigate & Banstead	Crawley	Wealden	England	Mid Sussex	Northern WS HMA	Northern WS HMA	Northern WS HMA	Mid Sussex
5	Mid Sussex	Lewes	Wealden	Adur	Horsham	Lewes	South East	Northern WS HMA	South East	Coastal WS HMA	Horsham	Arun
6	Brighton & Hove	Coastal WS HMA	Reigate & Banstead	Brighton & Hove	Mid Sussex	Northern WS HMA	Arun	South East	Arun	England	Reigate & Banstead	Coastal WS HMA
7	South East	Adur	Lewes	England	Northern WS HMA	Worthing	Northern WS HMA	England	Coastal WS HMA	Adur	South East	West Sussex
8	Northern WS HMA	Horsham	Adur	Wealden	Lewes	Arun	Coastal WS HMA	Arun	West Sussex	Worthing	Arun	Tandridge
9	Wealden	West Sussex	Arun	Arun	Chichester	Coastal WS HMA	West Sussex	West Sussex	Adur	West Sussex	West Sussex	Northern WS HMA
10	Lewes	Arun	Brighton & Hove	Mid Sussex	Wealden	Adur	Reigate & Banstead	Coastal WS HMA	Lewes	South East	Wealden	Worthing
11	West Sussex	Wealden	West Sussex	Chichester	Adur	West Sussex	Lewes	Reigate &Banstead	Reigate & Banstead	Horsham	Lewes	South East
12	Coastal WS HMA	South East	Worthing	West Sussex	West Sussex	South East	Adur	Horsham	Worthing	Mid Sussex	Coastal WS HMA	Wealden
13	Adur	Reigate & Banstead	Crawley	Crawley	South East	Horsham	Mid Sussex	Tandridge	Wealden	Lewes	Mid Sussex	Brighton & Hove
14	Arun	Mid Sussex	England	Worthing	Coastal WS HMA	Mid Sussex	Tandridge	Adur	Tandridge	Wealden	Chichester	Adur
15	Worthing	Northern WS HMA	-	-	Arun	Chichester	Horsham	Arun	Brighton & Hove	Brighton & Hove	Tandridge	Crawley
16	Crawley	Tandridge	-	-	Worthing	Brighton & Hove	Chichester	Worthing	Horsham	Reigate & Banstead	Adur	England
17	England	Crawley	-	-	England	England	Wealden	Brighton & Hove	Mid Sussex	Tandridge	Worthing	Reigate & Banstead

[7] All areas have shown improvement since 2001 therefore lower ranked authorities display less improvement

10. Given the large number of data sources listed in the tables above and to avoid over duplication of evidence already submitted a selection of the 'key' indicators (based on the set of sources identified within the PPG) are repeated below with commentary (denoted A-H in the table below). These are all for the same time period, and have been updated to reflect the most up-to-date data available at time of analysis (December 2016).

11. This confirms the findings of the HEDNA (EP20), that Mid Sussex is not an isolated case and reflects wider south-east/regional affordability pressures. Logically, it must therefore follow that an identical approach should be taken by Mid Sussex to the other comparison authorities when determining the level of uplift to be applied.

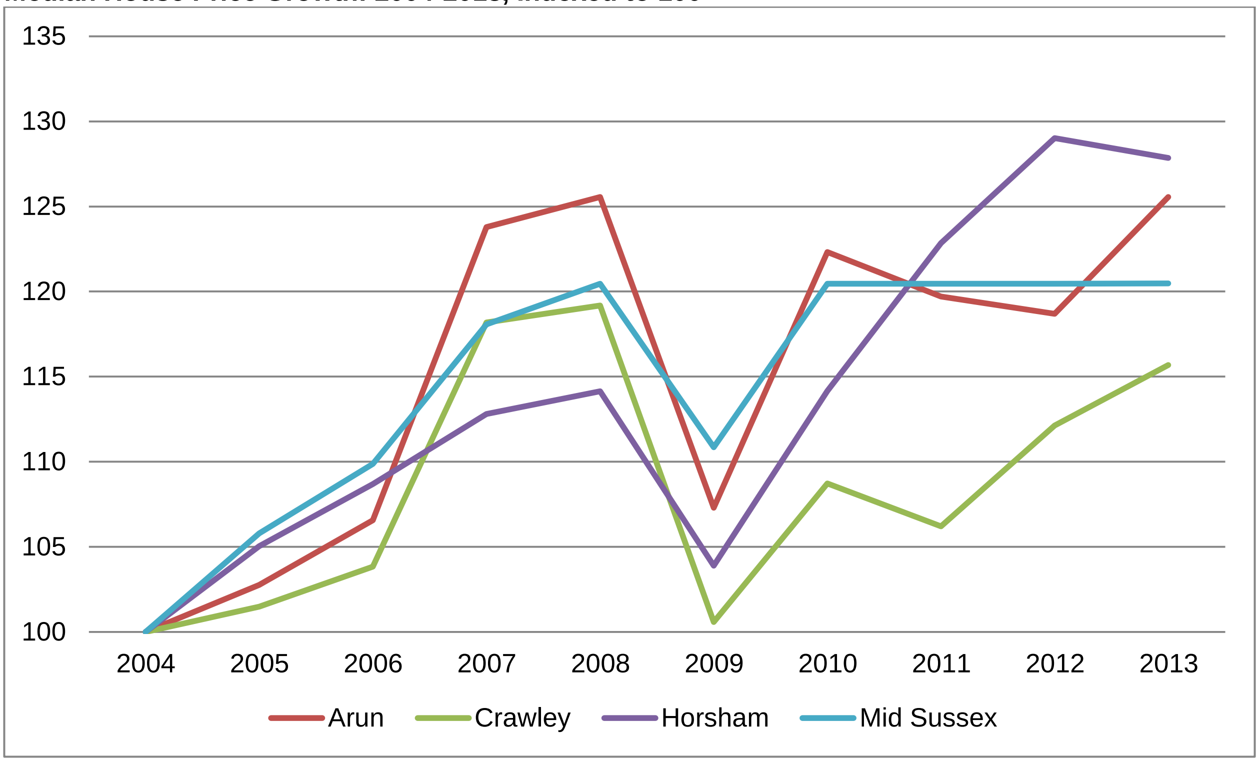
A: Median House Prices

Median House Price 2014

Area	£
Arun	229,950
Crawley	228,000
Horsham	315,500
Mid Sussex	296,025

Source: ONS House Price Statistics for Small Areas

Median House Price Growth: 2004-2013, Indexed to 100



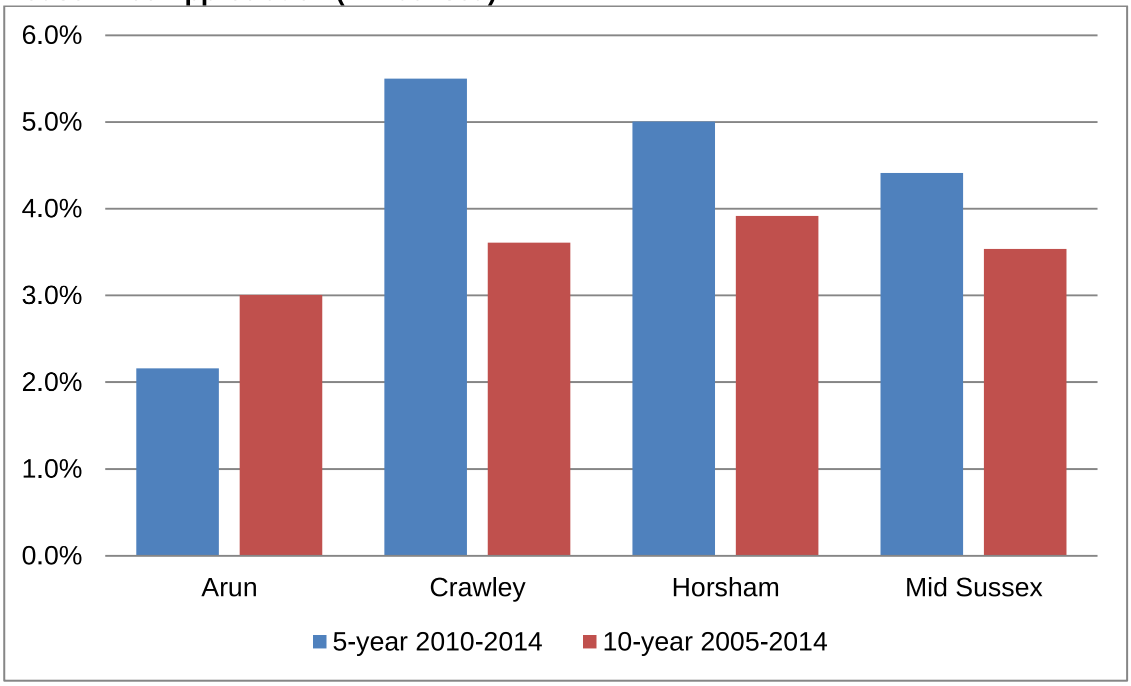
Source: CLG Table 582, Q.2

12. Data shows:

- Horsham has the highest median house price as at 2014, followed by Mid Sussex. Arun and Crawley share similar figures.
- In terms of increase over time (2004-2013), Mid Sussex shows a lower level of median house price increase compared to both Horsham and Arun.

B: House Price Appreciation

House Price Appreciation (Annualised)



Source: CLG Table 586

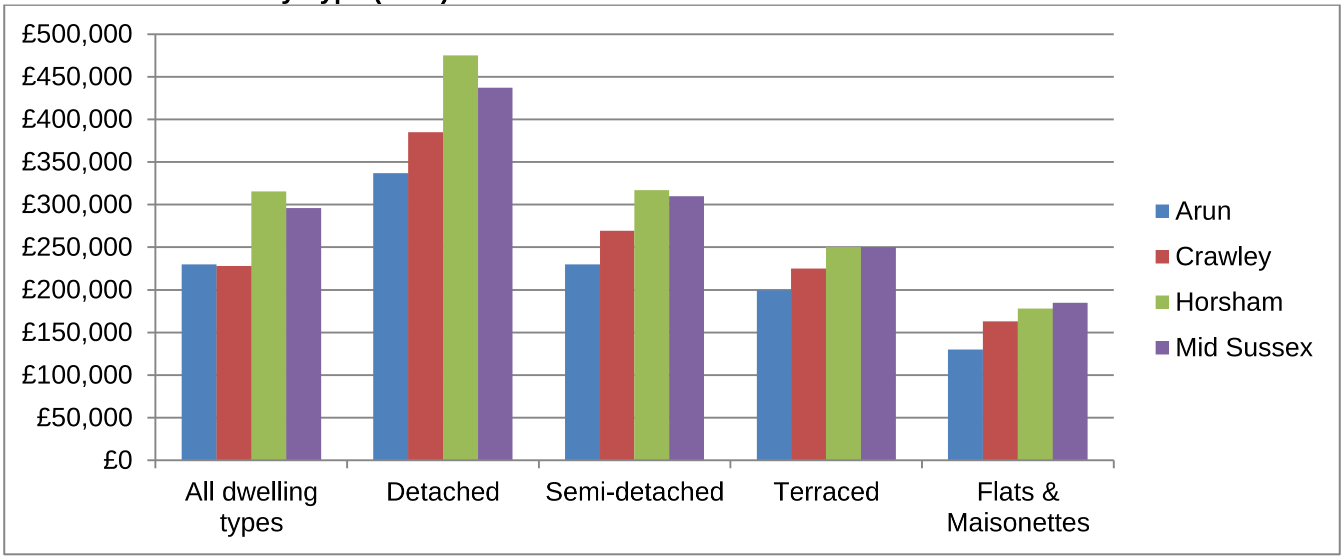
13. Data shows:

- Over a 5-year period (2010-2014) Mid Sussex has a lower rate of house price appreciation compared with Horsham and Crawley.

- Over a 10-year period (2005-2014) Mid Sussex has a lower rate of house price appreciation compared with Horsham.

C: Average House Price by Type

Median House Price by Type (2014)



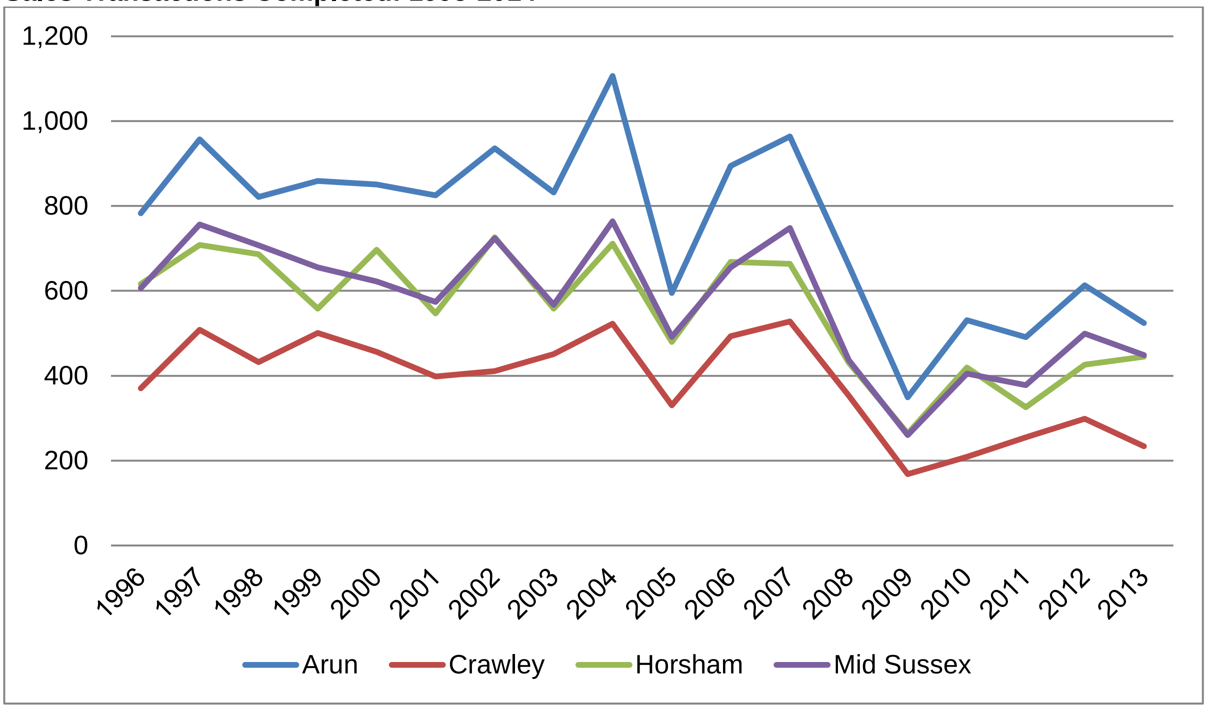
Source: ONS House Price statistics for small areas

14. Data shows:

- For all dwelling types, Mid Sussex has a lower median house price value compared to Horsham.
- The only dwelling type where Mid Sussex has a higher median house price compared to other authorities is for Flats and Maisonettes.

D: Sales Transactions

Sales Transactions Completed: 1995-2014



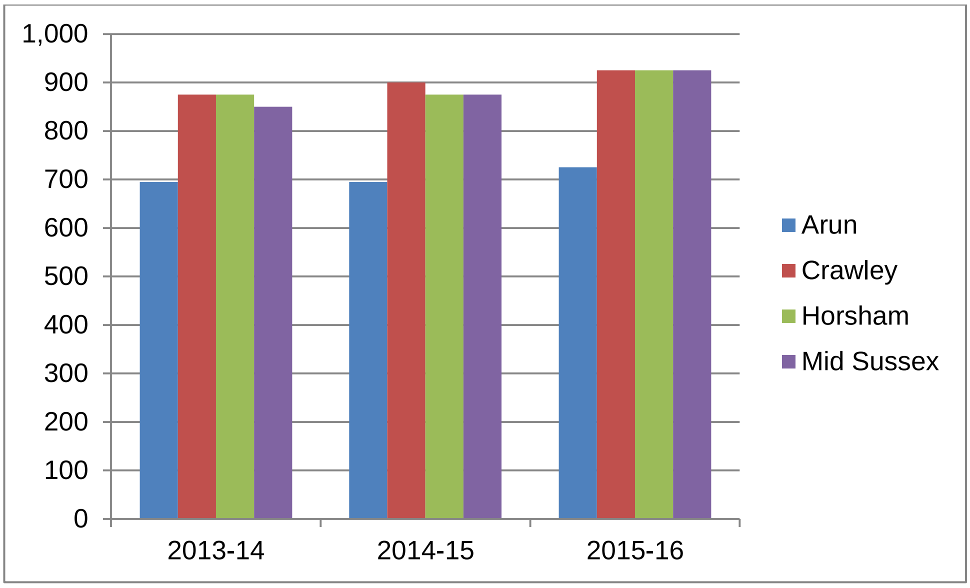
Source: CLG Live Table 584 (Q1, 2014)

15. Data shows:

- Mid Sussex shows similar trends in sales transactions to Horsham. Arun shows greater numbers of sales transactions over the period.

E: Rental Price Inflation

Median Rent Values 2014-2016



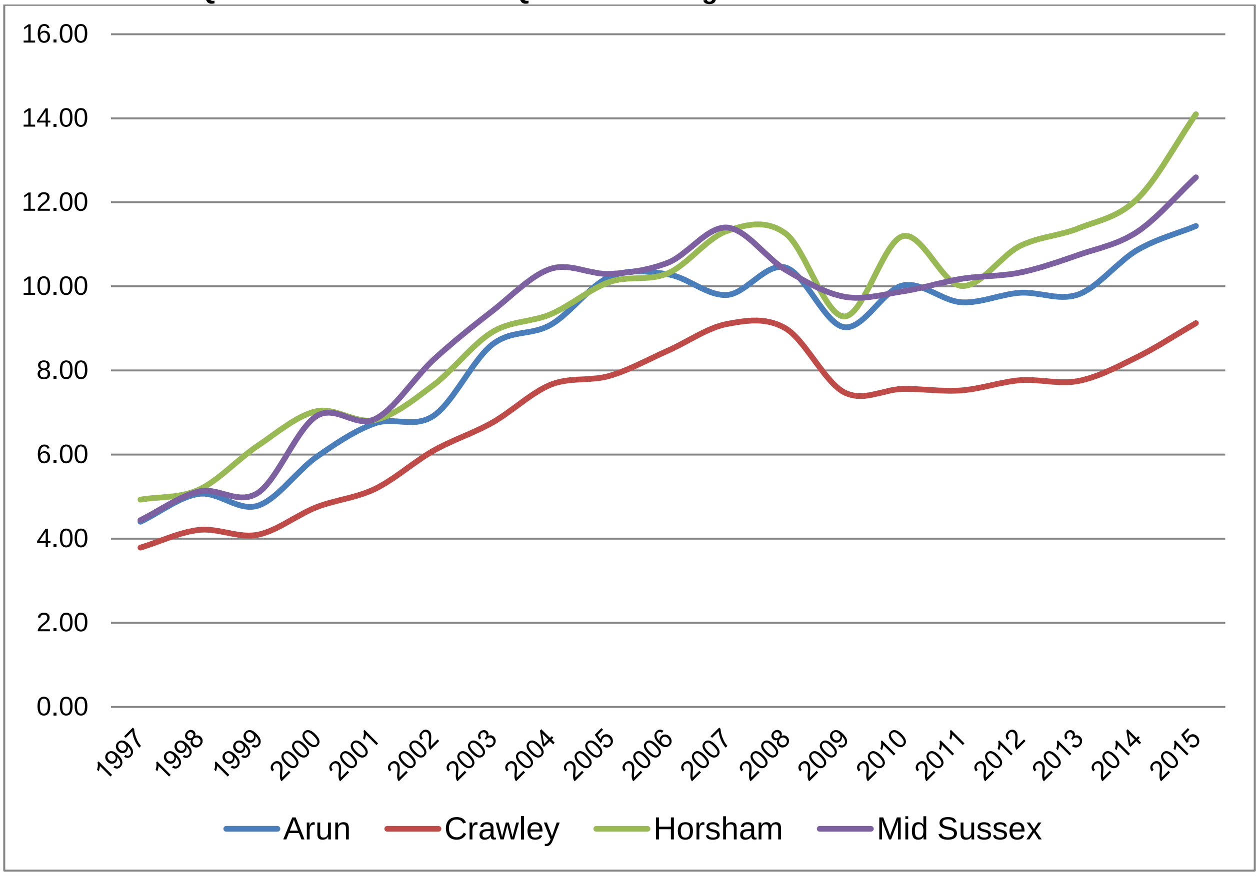
Source: Valuation Office Agency

16. Data shows:

- Mid Sussex showed a lower level of rent (median) compared to both Crawley and Horsham in 2013/14.
- Whilst this increased in 2014/15 and 2015/16, it is still at a comparative level to Horsham.

F: Ratio of Lower Quartile Prices to Lower Quartile Earnings

Ratio of Lower Quartile Prices to Lower Quartile Earnings



Source: CLG Live Table 576

17. Data shows:

- Mid Sussex follows a similar trend to all comparative authorities. This is also broadly similar to the regional and national trend in affordability.
- Mid Sussex has shown a significantly lower affordability ratio than Horsham, particularly in the past 5 years.
- All authorities have been relatively stable in the past 10 years.

G: Overcrowding

	2001 Households	Over Occupied	2001%	2011 Households	Over Occupied	2011%
Mid Sussex	51969	2015	3.88	57409	3199	5.57
Arun	62733	3308	5.27	66706	4467	6.70
Crawley	40382	3064	7.59	42727	4196	9.82
Horsham	50037	2158	4.31	54923	2929	5.33

Source: Census 2001/2011

18. Data shows:

- The lowest percentage of households over-occupied compared to all comparative authorities in 2001. It is significantly lower than Arun and Crawley.

- Whilst absolute levels of over-occupation have risen faster than Horsham according to Census 2011, the overall level of household growth has been at a greater rate (MSDC: 5,440; HDC: 4,886) which may account for this. The similarities between Mid Sussex and Horsham are evident.

H: Concealed Households

	2001			2011		
	All families	Concealed	%	All families	Concealed	%
Mid Sussex	37,258	261	0.7%	40,824	509	1.2%
Arun	41,213	333	0.8%	43,896	666	1.5%
Crawley	28,525	356	1.2%	29,829	755	2.5%
Horsham	36,065	241	0.7%	38,935	451	1.2%

Source: Census 2001/2011

19. Data shows:

- Mid Sussex had the joint lowest percentage of concealed households, both Mid Sussex and Horsham showed rates of 0.7% in 2001.

- This has increased to 1.2% in 2011, however this is still the same percentage as Horsham.

- Both Mid Sussex and Horsham show more favourable rates compared to Arun and Crawley.

Review of Data: Conclusions

20. The above analysis provides a flavour of the findings set out in each authority's housing needs assessment. In each case, Mid Sussex is shown to be in a more favourable position or equal to Horsham for nearly every indicator – this is not surprising given the similar demographics, authority size, and the fact both are within the same Housing Market Area.

21. A full comparison between the 4 authorities was presented within the HEDNA (EP20). Table 26 (page 64) presents a ranking of 17 comparative figures – each comparison authority, the County, region and for England as a whole.

22. Out of the 12 market signals indicators within this table:

- Mid Sussex show more favourable market signals for 7 of the 12 objectives compared to Arun, notably better compared to rates of affordability change, concealed households, overcrowding and homelessness acceptances.

- Mid Sussex show more favourable market signals for 7 of the 12 objectives compared to Crawley. In relation to rents, concealed households, overcrowding and homelessness acceptances Mid Sussex is significantly better.

- Mid Sussex show more favourable market signals for 7 of the 12 objectives compared to Horsham, notably better with regards to the affordability signals.

	Mid Sussex – Better Position	Mid Sussex – Worse Position
Arun	7	5
Crawley	7	5
Horsham	10	2

23. The analysis demonstrates the conclusions reached within the HEDNA, that Mid Sussex is not an isolated case with regards to market signals, is true.

24. The three comparison authorities have all sought to resolve market signals issues using the same methodology – a return to CLG 2008 headship rates for the age groups most in need (predominantly those aged under 34) and uplifting accordingly. The above analysis of data sources and indicators shows that Mid Sussex is justified in undertaking the same approach, as the comparison authorities predominantly show worse market signals than Mid Sussex (in some cases, significantly). The analysis does not show Mid Sussex having particular affordability issues in comparison to the other three authorities.

The link between Affordability and Unmet Need

25. The Councils view is that although practice guidance refers separately to market signals and unmet need the two are highly interrelated and in many respects should be treated together, as they cannot really be distinguished. In simple terms this is underpinned by the basic economic theory of supply and demand in which excess demand over available supply creates rising demand, which if not matched by a competitive response in supply, means that it is likely that prices will rise to choke off excess demand, all other factors remaining equal, until such time as a perfectly competitive supply response is possible.

26. The Council's analysis also suggests unsurprisingly that the housing market within districts is strongly integrated with other neighbouring districts within the Housing Market Area.

27. DCLG household projections are based on recent trends in the housing market as a whole, but specified at District level, based on trend shares.

28. Mid Sussex has long played a role in meeting the housing needs of households originating in Brighton and Hove and Crawley, as shown in Table 1 below. An interpretation of the data shown in the table might be that that as housing supply has tightened over the past 5 years or so in Brighton and Hove, more households originating in Brighton have sought homes in Mid Sussex. It is this trend which appears to underpin some of the increases in household projections for Mid Sussex in recent years. The position for Crawley appears more cyclical, potentially related to the economic cycle, possibly driven by relative affordability in the context of recession and recovery.

29. It follows from such analysis, and the use of recent trends by DCLG to inform DCLG projections that the needs of Brighton and Crawley are already substantially reflected in the DCLG household projections. This is because moves from Brighton and Crawley are an established part of housing demand in Mid Sussex. Demand from these sources is also likely to be substantially reflected in market signals.

30. The Council nevertheless accepts the position that it should meet additional unmet needs of neighbours where sustainable capacity allows.

Table 1 Annual Household Movements into Mid Sussex

Year	Mid Sussex Annual Household Growth (DCLG)	Net Growth in Households moving from Crawley	% of Annual Total Household Growth	Net Growth in Households from Brighton and Hove	% of Annual Total Household Growth	Growth in Mid Sussex from Mid Sussex and other sources	% of Annual Total Household Growth
2002	468	121	26%	90	19%	257	55%
2004	346	101	29%	178	52%	66	19%
2006	650	81	12%	153	24%	416	64%
2008	777	77	10%	197	25%	503	65%
2010	766	8	1%	151	20%	607	79%
2011	582	20	3%	160	27%	402	69%
2012	553	24	4%	178	32%	351	63%
2013	755	101	13%	247	33%	407	54%
2014	831	122	15%	233	28%	476	57%
2015	681	110	16%	210	31%	361	53%
Ave							

Appendix C: Affordable Housing Calculation Update

Appendix C: Affordable Housing Calculation Update

1. The Council has been in discussion with the developers forum with the aim of reaching common ground on the level of affordable housing need. Mid Sussex now agrees that the Gross Housing Need starting point is not necessarily 800 dpa (an approach used perhaps in error by many authorities) as it is agreed that the 800 'nets out' some of the forming and dissolving households. However in practice MSDC suggest that strictly there is no ideal method for estimating a true gross figure. Progress has been made and points of disagreement are reduced and relate to two estimations or 'lines' in the model related to:

   - The best means of estimating gross household formation: and
   - The role of the existing 'committed' supply of affordable housing.

2. Each is considered further below and the alternative scenarios for affordable housing need are set out in the two tables at the end of this Appendix. The Forum and Mid Sussex District Council agree the arithmetic and steps (structure) of the calculation as presented in these tables.

New household formation (line 2.1 of model)

3. NPPG identifies at paragraph 25 the use of CLG Household projections as the basis for calculating new household formation. NPPG states LPAs should establish unmet (gross) need for affordable housing.

4. The NPPG does not state the use of a restricted cohort method to calculate gross household formation, limiting guidance to a calculation of the 'number of newly forming households'. However, analysis of household formation does appear to indicate a decline in household formation beyond the age of 44 which appears to support the use of a restricted cohort method for age groups 15-44 for calculating gross household formation.

5. There is no current guidance on how this calculation should be made or the time period for analysis. Representations made suggested an analysis period of five years (Barton Wilmore on behalf of Welbeck Strategic Land 20534) and fifteen years (NLP on behalf of Wates development 14681). The Council considers the latter approach represents an appropriate time period for analysis as this better accords with the District Plan 17-year plan period.

   - Mid Sussex analysis of a restricted cohort calculation of gross household formation for age groups 15-44 for a fifteen year period gives a figure of 1,055 newly forming households per annum.
   - The Developer's forum present an alternative calculation of gross household formation for age groups 15-44 for a fifteen year period giving a figure of 1,218 newly forming households per annum.

6. The Council' case for the 15 year period is that it reflects valid and actual DCLG projections for the whole plan period. The Council does not believe there is any case to select a shorter period when data is available for the full period from an official, standard and recommended source. A longer period may also reflect fluctuations over the economic cycle. It is also common in forecasting practice to frontload growth, because of uncertainties about the long term validity of adopted growth rates. This is evident if forecasts are plotted on a graph. The use of use of an early years only extrapolated approach by the Forum tends therefore to inflate overall growth over the full period, as in this case.

7. Because of the limited guidance on how this calculation should be made, it is unlikely that a firm position can be taken on what constitutes a ‘correct’ figure. It is therefore considered that the best assumption may be that gross household formation is in the range of 1,055 to 1,218 newly forming households per annum.

Committed Supply of New Affordable Housing (line 3.3)

8. NPPG states at paragraph 26 “*There will be a current supply of housing stock that can be used to accommodate households in affordable housing need as well as future supply. To identify the total affordable housing supply requires identifying the current housing stock by…identifying the committed supply of new affordable units (social rented and intermediate housing) at the point of the assessment (number and size)*”.

9. The counting of the committed supply of affordable housing at the point of assessment clearly accords with NPPG and is used universally in NPPG compliant assessments of affordable housing need. To discount them would be to discount a supply of affordable housing that is legitimately available to meet needs, much as the committed supply of general housing is offset against requirement or need for general housing.

10. The supply of stock stated by the Council on line 3.3 of the model is committed stock. Only sites with extant planning permission with legal agreements are included. Many of the sites are also under construction. These affordable housing units are available to meet existing needs (the housing register) and future needs for affordable housing from the proportion of new households falling into need (line 2.2) and should be included within a NPPG compliant assessment.

11. Ultimately, if commitments are not counted in the analysis then it is not clear which groups will benefit from such commitments. In addition, this source of affordable housing will be topped up with new commitments as further general housing is granted planning permission.

Conclusion

12. As shown in the table below, in the Council’s view on the basis of a range of gross household formation of range of 1,055 to 1,218 households per annum, and including the committed supply of affordable housing, the Council can meet 93-130% of its core housing need and 66-82% of need based on the total housing register at 800 dwellings per annum with an affordable housing requirement at 30% provision. At an hypothetical 850 dwellings per annum, it can meet 99-138% of its core housing need and 70-87% of need based on the total housing register.

13. The Positions shown in the Table are believed to represent the final common ground of the two parties, although at the time of drafting the actual statement remains unsigned.

Affordable Housing Needs – Reasonable Preference Groups

Source: HEDNA Update (EP21) Table 17, HEDNA Addendum (EP22) Table 7 and Barton Willmore OAN (1/20534, Appendix B para 4.36)

Step	Stage 1: Current Housing Need (Gross)	MSDC – HEDNA Update/ Addendum	MSDC – December 2016	Developer Forum (incl. committed supply)	Developer Forum (excl. committed supply)	Agreed Position
1.1	Homeless Households and those in Temporary Accommodation	0	0	0	0	0
1.2	Overcrowding and Concealed Households	0	0	0	0	0
1.3	Households in Need in Reasonable Preference Groups	255	330	330	330	330
1.4	**Total Current Affordable Housing Need (Gross) (1.1 + 1.2 + 1.3)**	**255**	**330**	**330**	**330**	**330**
	Stage 2: Future Affordable Housing Needs					
2.1	New Household Formation (gross)	800	1,055	1,218	1,218	**not agreed**
2.2	Proportion of Households Unable to Buy or Rent	44.2%	44.2%	44.2%	44.2%	44.2%
2.3	Existing Households Falling into Need and Housed per Annum	105	105	105	105	105
2.4	**Total Newly Arising Need (Gross Per Year) (2.1 x 2.2 + 2.3)**	**459**	**571**	**643**	**643**	**~**
	Stage 3: Affordable Housing Supply					
3.1	Affordable Dwellings Occupied by Households in Need	0	0	0	0	0
3.2	Surplus Affordable Housing Stock	0	0	0	0	0
3.3	Committed Supply of New Affordable Housing	1,223	1,405	1,405	0	**not agreed**
3.4	Units to be taken out of Management	0	0	0	0	0
3.5	**Total Available Affordable Housing Stock (3.1 + 3.2 + 3.3 - 3.4)**	**1,223**	**1,405**	**1,405***	**0**	**~**
3.6	Annual Supply of Social Re-lets (net)	128	252	252	252	252
3.7	Annual Supply of Intermediate Affordable Housing for sale/let at sub-market level	43	26	26	26	26
3.8	**Annual Supply of Affordable Housing (3.6 + 3.7)**	**171**	**278**	**278**	**278**	**282**
A	Total Net Need (1.4 - 3.5)	-968	-1,075	-1,075	330	~
B	Annual Flow Backlog (10%) of Total Net Need 10yr period to relieve (A/10 years)	-97	-108	-108	33	~
C	**Net Annual Housing Need (2.4 + Annual Flow (B) - 3.8)**	**191**	**185**	**257**	**398**	**~**
	Annual total @ 30% AH Delivery	637	617	857	1,326	

* Committed supply included for illustrative purposes only to show impact of altering Step 2.1 with all other things being equal.

Affordable Housing Needs – Total Waiting List

Source: HEDNA Update (EP21) Table 18, HEDNA Addendum (EP22) Table 7 and Barton Willmore OAN (1/20534, Appendix B para 4.36)

Step	Stage 1: Current Housing Need (Gross)	MSDC – HEDNA Update/ Addendum	MSDC – December 2016	Developer Forum (incl. committed supply)	Developer Forum (excl. committed supply)	Agreed Position
1.1	Homeless Households and those in Temporary Accommodation	0	0	0	0	0
1.2	Overcrowding and Concealed Households	0	0	0	0	0
1.3	Households in Need in Reasonable Preference Groups	1,286	1,418	1,418	1,418	1,418
1.4	**Total Current Affordable Housing Need (Gross) (1.1 + 1.2 + 1.3)**	**1,286**	**1,418**	**1,418**	**1,418**	**1,418**
	Stage 2: Future Affordable Housing Needs					
2.1	New Household Formation (gross)	800*	1,055	1,218	1,218	**not agreed**
2.2	Proportion of Households Unable to Buy or Rent	44.2%	44.2%	44.2%	44.2%	44.2%
2.3	Existing Households Falling into Need and Housed per Annum	105	105	105	105	105
2.4	**Total Newly Arising Need (Gross Per Year) (2.1 x 2.2 + 2.3)**	**459**	**571**	**643**	**643**	~
	Stage 3: Affordable Housing Supply					
3.1	Affordable Dwellings Occupied by Households in Need	0	0	0	0	0
3.2	Surplus Affordable Housing Stock	0	0	0	0	0
3.3	Committed Supply of New Affordable Housing	1,223	1,405	1,405	0	**not agreed**
3.4	Units to be taken out of Management	0	0	0	0	0
3.5	**Total Available Affordable Housing Stock (3.1 + 3.2 + 3.3 - 3.4)**	**1,223**	**1,405**	**1,405***	**0**	~
3.6	Annual Supply of Social Re-lets (net)	128	252	252	252	252
3.7	Annual Supply of Intermediate Affordable Housing for sale/let at sub-market level	43	26	26	26	26
3.8	**Annual Supply of Affordable Housing (3.6 + 3.7)**	**171**	**282**	**282**	**282**	**282**
A	Total Net Need (1.4 - 3.5)	63	13	13	1,418	~
B	Annual Flow Backlog (10%) of Total Net Need 10yr period to relieve (A/10 years)	6	1	1	142	~
C	**Net Annual Housing Need (2.4 + Annual Flow (B) - 3.8)**	**294**	**294**	**366**	**507**	~
	Annual total @ 30% AH Delivery	980	980	1,220	1,690	

* Committed supply included for illustrative purposes only to show impact of altering Step 2.1 with all other things being equal.

Appendix D: Economic Adjustments to the OAN

Appendix D: Economic Adjustments to the OAN

MSDC – Economic Forecast Position

1. Representatives from the Council and Developers Forum have discussed the methodology and data sources for economic forecasting in order to attempt to reach agreement on whether an uplift to OAN is required to meet economic forecasts. Whilst there is agreement on the inputs into the demographic forecasting model, there are disagreements regarding the economic forecast data. As stated in MSDC 2, there is confusion as to whether the 'supply side' figure of 420jpa can be directly compared with the economic growth 'target' of 424-521jpa arising from varying sources of economic forecasting. This is because the 'supply' figure is only concerned with additional workforce arising from household growth (and is therefore the number of new Mid Sussex residents filling a job in Mid Sussex) whereas the 'target' figure of 424-521jpa is a forecast of economic growth within the District arising from both Mid Sussex residents filling Mid Sussex jobs as well as in-commuting. In any event, housing provision of 800dpa will meet the lower end of the economic forecasting range.

2. In terms of the economic evidence, there are two key numbers:

    - The number of additional workforce likely to be generated from increased housing supply (i.e. the output of demographic modelling within PopGroup software) – the 'supply' figure.

    - The number of jobs forecast to be required within the District, based on economic forecasting (i.e. the data produced by Experian/Oxford Economics – the 'target' figure.

3. PopGroup modelling uses the relevant population/household projections and applies assumptions on economic activity rates, unemployment rate and commuting ratios to determine the additional workforce that would be generated by household growth. On these three important inputs, the Council and Developers Forum agree on the data source and the rates to be used. This is the 'supply' side of the equation.

4. There is disagreement regarding the 'target' side of the equation in terms of the economic forecasting from Experian/Oxford Economics. This is largely related to an anomaly within one set of forecasting data supplied by Experian.

5. The submitted evidence base shows the Economic Growth Assessment (EP35) forecasting an annual job growth of 521jpa, based on May 2013 Experian forecasts. This was updated within the Burgess Hill Employment Sites Study (BHESS, EP36) which showed job growth of 478jpa based on December 2015 Experian forecasts.

6. The Developers Forum have submitted in their statement that the 478jpa figure has been incorrectly reported by EP36, and should be 687jpa. This is based on correspondence between themselves and Experian in November 2016. However, the Council also have correspondence between Chilmark Consulting (who undertook the BHESS) which questions the figures- the 478jpa was based on a revised set of figures supplied by Experian to account for an issue with the data. This disagreement is unlikely to be resolved as both have received the projections from Experian and used them in good faith.

7. The Council commissioned new data from Oxford Economics in November 2016 as a sense check. This shows annual jobs growth of 424jpa (2014-2031). A longer term trend from 1991, to account for varying economic cycles, shows annual job growth of 514jpa.

8. The Council believe that, in order to account for the difference of opinion caused by varying time periods and data sources, the safest position is to assume the job growth ‘target’ is somewhere within the range 424-521jpa. As newer data should take precedence, the Council believe it is likely that the exact figure is towards the bottom of this range. The Developers Forum argue that the range is 424-687jpa based on their understanding of the December 2015 Experian forecasts.

9. As stated in MSDC 2, the Council are of the view that the ‘target’ and ‘supply’ figures cannot be easily compared. The ‘target’ number is an economic forecast of total jobs within the District, regardless of whether they are filled by Mid Sussex residents or in-commuters. The ‘supply’ figure is the number of additional workforce likely to arise from new house building – i.e. resident workforce that would both live and fill a job in Mid Sussex.

10. By adjusting the OAN to meet the ‘target’ figure, this assumes that the only way of meeting the economic forecasts is by increasing housing supply. The Council suggests that this in a rather over simplified and ultimately unreliable method on which to base any changes to housing numbers, unless the forecast really do suggest a step change or clear break in trends. It appears rather a case of a peremptory ‘splitting of hairs’ to suggest adjustments must be based on minor changes to favour the Forum’s preferred case. This is especially the case as in practice the relationship between housing, households and labour supply is not a straightforward one, rather it is mediated through factors such as:

- Commuting trends;
- Activity Rates;
- Unemployment;
- Short term fluctuations in the economy;
- Fluctuations in actual supply and the market flexibilities already available in the concept of land banks and market based economy.

11. Overall, 800dpa provides 420jpa, which is almost equal to the bottom end of the economic forecast range. Any increase above 800dpa will ensure that workforce growth arising from new house building will be within the range identified by economic forecasting. The Council will monitor actual trends

Appendix E: Update on Common Ground on Sites and Commitments

Appendix E: Update on Common Ground on Sites and Commitments

Update on Outstanding Issues of Disagreement on 5 year Land Supply Sites with the Developers Forum

Point of Difference	Site under dispute	MSDC Position	Forum Position
Large sites where development has commenced	Sewage treatment works, Burgess Hill (line 4) (325 units)	MSDC has strong evidence from land owner that at least 150 units can be delivered at STW within 5 years and the whole site delivered in the Plan period. The letter from the landowner setting out the current position clearly indicates that action is being taken to bring the site forward. The Government, through the HCA, has directly intervened to unlock this site. A loan of £4.7m has been agreed and the site is currently being cleared. The HCA is satisfied, following rigourous due diligence, the site is deliverable in the short term. Indeed, the loan would not have been made available had there been doubts about deliverability. The site will be divided into 3 plots, the first of which is under offer. An article appeared in the Mid Sussex Times (8th December 2016) reporting on the work being undertaken to clear the site. The site can be accessed from Issacs Lane, Burgess Hill, using the existing roadway that also gives access to the waste transfer station. The development will also have walkways going south and east connecting the development to existing housing and facilities in Leylands Ward, Burgess Hill, which include shops and a mainline station. The main connection to the south is in the control of the existing landowner and no third party is involved. Little weight can be given to letters supplied to the Forum, stating that they would not purchase the site.	Forum have removed 150 at Burgess Hill Former STW in the 5 year supply and the site in total (325 units). Whilst outline pp was granted in June 2014, no RM app has been submitted yet. nor is there evidence of any pre apps on the proposed housing layout. The Forum dispute the site is a deliverable and viable proposition, and have submitted letters to demonstrate that this site is not a site those in the development industry would choose to invest in given the combined effects of the unneighbourly adjoining uses that take access through the site. They state that HCA's involvement in forward funding infrastructure provision does not necessarily mean that the homes will be built within a certain timeframe; and the consent Glenbeigh have secured shows links for footpaths and cycles and indeed potentially for vehicles through adjacent third party land that is under the control of Rydon Homes, and that no discussions have taken place to date with Rydon Homes about this important aspect of securing an integrated and sustainable scheme
Large sites with Planning permission where development has yet to commence	R/O 17 Copthorne Road, East Grinstead (line 43) (25 units)	The access to the site is in Tandridge. The planning permission for this has expired, although the access within the site is in place. The permission for the housing within Mid Sussex remains extant. There is currently an appeal lodged against non determination of a new application for the access. The Council is not aware of any landownership issues that would prevent this site coming forward for development.	Forum have removed the 25 dwellings identified at r/o Copthorne Road given Landowner issues
	Stafford House, Hassocks (line 53) (14 units)	The children's home needs to find new premises. However there is no evidence to show that this cannot be achieved. The fact that the permission for the redevelopment of the site has recently been renewed indicates that the landowner still indents to vacate the site in the short term.	Forum have removed 14 dwellings identified at Stafford House - as the applicants need new premises before pp can be implemented
	Hyde Estate, Handcross (line 70) (90 units)	Permission was granted for two schemes, one for just one of the sites and the other for a larger scheme covering two sites. Pre-application discussions indicate that the single site is being brought forward for development for 75 units. However, the pre applications discussions are on going and the final number of units is still subject to agreement once the density and housing mix has been finalised.	Forum have amended yield from 90 to 75 to reflect the area that has been sold and the associated covenants
Large allocated sites without planning permission	Land at Rocky Lane, Haywards Heath (line 80 and 81) (245 units)	No reason why site cannot deliver 150 units in 5 years. Planning application submitted. Letter from planning agent submitted which sets out delivery timescales.	Forum have amended yield to 100 in 5 years. This is because the current application has only recently been submitted, is an outline application which has yet to be determined, and the Forum consider the time to report to committee, resolve the S106, dispose of the site (the applicant is a land agent) submit the RM and discharge the pre commencement conditions is such it is unlikely anything more than 100 units will be delivered in the next 5 years.
	NCP Car Park Haywards Heath (line 109) (40 units)	Pre application discussions have been had with the Council on basis that site will be available in next 5 years.	The Forum have removed 40 identified for this site as they do not believe the site is currently available for development/ developable

District Plan allocation at Burgess Hill	Northern Arc Allocations (line 119)	MSDC believe the site can accommodate 3,500 units. Work on density of land parcel has been undertaken and shared with developers. Concessions refered to by the Forum do not justify the reduction in the numbers previously agreed to be delivered in the first 5 years.	Scale of development reduced by Forum to reflect the Northern Arc consortiums statement i.e. 255 for the 5 year HLS and 2,730 over the plan period. as discussed at the EIP the identified figure of 255 is a maximum level of delivery in the 5-year period identified by the promoters subject to certain concessions being made by the Council in December 2016. These concessions have not been made to date and it is unclear if / when they might be. As such, this figure should be seen as a maximum for the purposes of this Examination only
District Plan allocation at Pease Pottage	Pease Pottage, Parish Lane (line 120)	Based on evidence provided by the developer, 450 units can be delivered in 5 years.	Planning Permission Granted not all Forum members agree the full 450 in the first 5 years. This has been maintained at 450 purely to show the best case in terms of the 5 year HLS
Other Commitments	Station Yard Hassocks (line 106) (70 units)	Site is allocated in the Small Scale Housing Allocations DPD. Reasonable to assume the site will come forward during Plan Period. Previous expired planning application. It does not need to be allocated in District Plan or Neighbourhood Plan as it is already allocated.	The Forum have removed the 70 identified for this site - There is a development brief for Station Yard Hassocks dated March 2012, it was also allocated in the Small Scale Housing Allocations DPD (2008) as site SSH/6 with a potential capacity of 60 – 70 dwellings together with business space. Nothing has progressed to demonstrate that this site is available, deliverable or achievable. Furthermore it is not identified in the NP nor the MSDC DP.
	Stone Quarry Woods, East Grinstead (line 100) (40 units)	Local Plan allocation. MSDC are re-visiting this site to see what can be done to bring site forward.	The Forum have removed the 40 identified for this site. This was an old allocation (small scale housing allocations), DMH tried very hard to get this through pre-app and didn't get anywhere, access problems, it forms part of the Queen Victoria Hospital. This is a non-starter (at the moment). The Forum can provide more info if necessary.

MID SUSSEX TIMES 8TH DECEMBER 2016

Residents complain about 'loud drilling'

Jennifer Logan
middy.news@jpress.co.uk
01903 282363

Burgess Hill Town Council has responded to complaints from residents who say they have put up with a 'loud drilling noise' six days a week.

The 'horrible noise' was due to the demolition of a former sewage works in Fairplace Hill, which will see 325 new homes built on the site.

Councillor Pru Moore, who had also endured the noise, sympathised with neighbours.

She said: "It is horrible, but unfortunately the work will have to continue and the sooner it can get done, the better.

"The contractors are doing their best and are working well and the work is set to finish by Christmas."

Fairbridge Developments Ltd, in South Road, Haywards Heath, appointed Cognition Land and Water, based in Surrey, to carry out the demolition, which has seen on-site buildings removed, along with concrete slabs and small trees.

A Berry Close resident, who asked not to be named, said she had to put up with 'constant thudding vibration' and feared 'possible damage to property and long-term effects from the noise'.

"There is loud drilling from 8am until 6pm, five days a week and again on Saturday mornings and the developer did not feel it worth bothering to let us know," she said.

She added: "Thankfully we have not been subjected to noise on a Sunday, however, in the first week the work began at 7.30am until 9pm."

She added that the quantity of trees felled had 'displaced buzzards who had nested there for a number of years' and it was 'unlikely that this year's brood would survive'.

Councillor Pru Moore confirmed the lack of communication but ensured wildlife 'had been protected'. She said: "There was an initial lack of communication but the developer has since been in touch with residents and checks in protecting the wildlife would have been completed."

John Goddard, technical director, from Cognition Land and Water, apologised to anyone who has been affected by the noise.

He said: "We had no intention to cause upset and we know the noise is irritating, however, there is no quiet way of getting around it as we are removing concrete."

He added that it was hoped the 'noise nuisance' would stop by the end of the week and 'if any residents' feel concerned, he is happy to speak to them'.

Mid Sussex District Council: Commitment Schedule As at 1st October 2016 (position updated 07/12/2016)

Town / Parish	Site Address (sites of 6+ units)	Site Totals	Year 1 - 5	Forum Position	Total Supply Remaining	Forum Position	SHLAA ID#	PP Ref #	PP Lapse Date	Progress	
Large sites where development has commenced											
Ansty & Staplefield	Land South of Rocky Lane, Haywards Heath (Phase 1)	96	34	34	34	34	239	12/00535/OUT	commenced	Commenced	1
Ansty and Staplefield	Land South of Rocky Lane, Haywards Heath (Phase 2)	101	101	101	101	101	485	13/00656/OUT	pending s106	Commenced	2
Ardingly	Land between Lodgelands and Standgrove Place, College Lane, Ardingly	36	36	36	36	36	187	DM/15/1511	12/10/2018	Commenced	3
Burgess Hill	Former Sewage Treatment Works, Burgess Hill	325	150	0	325	0	45	08/1644/OUT	24/06/2019	Commenced, G+T implemented. Site being decontaminated.	4
East Grinstead	South of The Old Convent & St Margarets Convent, Adj to Moatfield Road, East Grinstead	74	18	18	18	18	97+98	14/00294/FUL	25/06/2017	Commenced	5
East Grinstead	Former Caffyns Garage, King Street, East Grinstead	12	12	12	12	12	524	14/03838/FUL	commenced	Commenced	6
Burgess Hill	Keymer Tile Works Nye Road Burgess Hill	475	250	250	475	475	91	09/03697/OUT 14/02830/REM	30/04/2017	Commenced	7
Burgess Hill	Land East of Kingsway Burgess Hill	480	250	250	427	427	233	12/01532/OUT 14/03208/REM	10/05/2016	Commenced	8
East Grinstead	St. Lukes House and St. Lukes Church, Holtye Avenue, EG	14	14	14	14	14	439	12/00439/FUL	08/07/2016	Commenced	9
East Grinstead	Farringdon House, Wood Street, East Grinstead	41	41	41	41	41	313	10/01400/EOT	Commenced	Lawful start made but development on hold	10
East Grinstead	Sussex House, London Road, East Grinstead	8	8	8	8	8	409	13/02313/PDOFF (27) DM/15/4546/pdoff (27) 13/04040/FUL(8)	27/01/2017	Application for additional floor remains	11
East Grinstead	St James House 150 London Road, East Grinstead	41	41	41	41	41	577	14/00636/PDOFF(31) 14/01369/FUL(4) 14/01370/FUL(6)	30/05/2016	Commenced	12
East Grinstead	151 London Road, East Grinstead	4	4	4	4	4	758	14/04391/FUL	04/02/2016	Commenced	13
East Grinstead	151 London Road, East Grinstead	12	12	12	12	12	758	14/03159/FUL	30/05/2016	Commenced	14
East Grinstead	1 Christopher Road, East Grinstead	16	16	16	16	16	412	14/02470/PDOFF	20/05/2016	Commenced	15
East Grinstead	extension to 1 Christopher Road, East Grinstead	10	10	10	10	10	412	DM/15/1565	01/10/2018	Commenced	16
Haywards Heath	1 -3 Church Road, Haywards Heath	43	43	43	43	43	126	13/03814/FUL	05/02/2017	Commenced	17
Haywards Heath	Bolnore Village Phases 4b & 5, south west of Haywards Heath	181	136	136	136	136	110	04/02676/OUT	Allocation	Commenced	18
Haywards Heath	Bolnore Village Phase 4a	34	6	6	6	6	110	10/03704/REM	Commenced	Commenced	19
Haywards Heath	Land to west of Beech Hurst, Butlers Green Road, Haywards Heath	10	10	10	10	10	448	13/01088/REM	27/06/2014	Commenced	20

Haywards Heath	Magistrates Court, Bolnore Road, Haywards Heath	36	36	36	36	36	706	13/04256/FUL	21/10/2017	Commenced	21
Haywards Heath	Norris House, Burrell Road, Haywards Heath	30	30	30	30	30	760	14/01395/PDOFF	30/05/2016	Commenced	22
Haywards Heath	Milton House, Milton Road, Haywards Heath	28	28	28	28	28	726	14/04674/FUL	05/06/2018	Commenced	23
Haywards Heath	Oldfield, 55 Lewes Road, Haywards Heath	10	1	1	1	1	700	13/02431/FUL	12/11/2016	commenced	24
Haywards Heath	36 Paddockhall Road, HH	9	9	9	9	9	454	14/01335/FUL	22/08/2017	Commenced	25
Haywards Heath	Beacon Heights, 4 Church Road, Haywards Heath	24	24	24	24	24	329			Commenced	26
Hurstpierpoint	Land north of Fairfield Recreation Ground, Chalkers Lane, Hurstpierpoint	61	26	26	26	26	284	DM/15/3658		Commenced	27
Lindfield Rural	Land to east of Gravelye Lane and South of Scamps Hill, Lindfield	217	147	147	147	147	494	12/04316/FUL	31/10/2016	Commenced	28
Slaugham	Golf Club Driving Range, Horsham Road, Pease Pottage	95	95	95	95	95	600	dm/15/3772 rem 13/02994/Out	04/11/2017	Commenced	29
Worth	Land east of Woodlands Close, Crawley Down (Phase 1)	44	3	3	3	3	518	12/00672/OUT	01/06/2016	Commenced	30
Worth	Land off Woodlands Close, Crawley Down (Phase 2)	51	33	33	33	33	672	13/03312/OUT	18/08/2017	commenced	31
Worth	Land at Wychwood, Turners hill Road, Crawley Down	22	23	23	23	23	272	14/0200/OUT	02/09/2017	Commenced	32
	Total		**1647**	**1497**	**2224**	**1899**					33
Permissions not yet commenced											
Ansty and Staplefield	L/A Holly Bank, Deaks Lane, Ansty	7	7	7	7	7	627	DM/15/0841	26/11/2018	recent permission	34
Bolney	Land West of London Road, Bolney	10	10	10	10	10	707	13/03506/FUL	13/03/2017	Some land to be transferred to owner from HA. Possible delay due to viability	35
Burgess Hill	Martlets, Town Centre redevelopment, Burgess Hill	142	142	142	142	142	528	NP allocation		New permission- agent confirms delivery 2019/2020	36
Burgess Hill	71 Victoria Road, Burgess Hill	14	14	14	14	14	693	13/02759/FUL	30/12/2016	Number of applications to discharge conditions. BC plans accepted.	37
Burgess Hill	69 Victoria Road, Burgess Hill	14	14	14	14	14	730	14/03097/FUL	08/01/2018	Number of applications to discharge conditions.	38
Burgess Hill	67 Victoria Road, Burgess Hill	12	12	12	12	12	501	DM/15/0235	18/09/2018	New permission	39
Burgess Hill	70 Station Road, Burgess Hill	13	13	13	13	13	535	14/02137/FUL	11/06/2018	Application to discharge conditions. BC plans approved	40
Burgess Hill	Land off Kings Way, Burgess Hill	64	63	63	63	63	46			Permission issued Oct 2016	41
Burgess Hill	Covers Timber Yard 107 Fairfield Road Burgess Hill	15	15	15	15	15	73	DM/15/1410	pending s106	New permission	42
East Grinstead	R/O 17 Copthorne Road, Felbridge	25	25	0	25	0	548	12/01796/FUL	20/12/2016	Access within site in place	43

East Grinstead	Mead House, Cantelupe Road	5	5	5	5	5	737			Agent confirm works should start may 2016	44
East Grinstead	Home, 3 Cantelupe Mews, East Grinstead	8	8	8	8	8	766			Build regs submitted	45
East Grinstead	Superdrug, 78 London Road, East Grinstead	7	7	7	7	7	773			No movement	46
East Grinstead	The Vinesong Trust, Warrenside, College Lane, East Grinstead, West Sussex, RH19 3LR,	14	14	0	14	14	444	12/01877/OUT	14/05/2017	No movement	47
East Grinstead	Land at Blackwell Farm Road, East Grinstead	10	10	10	10	10	513			No movement	48
East Grinstead	Tower Car Sales, Tower Close, East Grinstead	7	7	7	7	7	759	14/04338/FUL	09/02/2018	No movement	49
East Grinstead	Garland Court, Garland Road, East Grinstead	49	49	49	49	49	697	DM/15/1025	pending S106	New permission	50
East Grinstead	Land south of Phoenix House, Cantelupe Road, East grinstead	12	12	12	12	12	746			permisson granted 23.09.16	51
East Grinstead	Land adj to Greenstede House, Wood Street, East Grinstead	11	11	11	11	11	729			permission granted 21/09/16	52
Hassocks	Stafford House 91 Keymer Road Hassocks	14	14	0	14	0	472	DM/15/3309	pending s106	10/0251/FUL approved. Renew as need more time to find alternate premises	53
Haywards Heath	North of 99 Reed Pond Walk Franklands Village Haywards Heath	18	18	18	18	18	531	13/01776/FUL	13/08/2016	Amended scheme from 10/01024/FUL. In negotiations within developer.	54
Haywards Heath	6 Heath Sqaure, Boltro Road, Haywards Heath	9	9	9	9	9	702	13/03522/PDOFF	30/05/2016	No movement	55
Hayward Heath	Penland Farm, Haywards Heath	210	210	210	210	210	247	13/03472/out	12/01/2015	new full application pending decision	56
Haywards Heath	141 - 151 Western Road, Haywards Heath	14	14	14	14	14	199			New permission	57
Haywards Heath	Land between The Willows and Bennetss Rise, Haywards Heath	13	13	13	13	13	334			New permission	58
Haywards Heath	Land at Gamblemead, Haywards Heath	99	99	99	99	99	57			permisson issed 27/09/2019	59
Haywards Heath	L/A Oldfield 55 Lewes Road, Haywards Heath	7	7	7	7	7	771			permisson granted 09/06/19	60
Haywards Heath	Land to north of Rocky lane, Haywards Heath	30	30	30	30	30	745			Permission granted 14/10/2016	61
Hurstpierpoint	Sussex House, 23 Cuckfield Road, Hurstpierpoint	6	6	6	6	6	377	13/04055/PDOFF	30/05/2016	new application for 7 units pending DM/16/1565	62
Hurstpierpoint	Land to north of Hurstpierpoint	140	140	140	140	140	238	12/0414/Out	04/09/2017	Permission July 2016	63
Hurstpierpoint	Land north of Highfield Drive, Hurstpierpoint	17	17	17	17	17	2	12/04141/OUT 14/01515/FUL	04/09/2017	Applications to discharge conditions approved. BC plans approved.	64

Horsted Keynes	Ravenswood Hotel, Horsted Lane, Sharpthorne	12	12	12	12	12	728			permission granted 02/06/2019	65
Lindfield Rural	Buxshalls, Ardingly Road, Lindfield	19	19	19	19	19	586	14/01120/FUL	23/06/2017	Possible change to application to remove age occupancy	66
Lindfield	Springfield Farm, Lewes Road, Scaynes Hill	6	6	6	6	6	761	14/03160/PDOFF	30/05/2016	Further applications approved for external changes	67
Slaugham	Land at Caburn and St Georges House, Brighton Road, Handcross	7	7	7	7	7	704	13/03768/FUL	04/02/2017	Applications to discharge conditions approved and pending.	68
Slaugham	Seaspace House Brighton Road Handcross	7	7	7	7	7	321	14/02534/FUL	25/09/2017	no movement	69
Slaugham	Land at Hyde Estate, Handcross	90	90	90	90	75	517+647	12/04032/OUT	01/05/2017	Application for revised scheme expected	70
Slaugham	Sherwoods Works, Brighton Road, Handcross	7	7	7	7	7	762	DM/15/0458	24/07/2018	Appplication to discharge conditions pending.	71
Slaugham	Allotment Gardens, Handcross	6	6	6	6	6	709			No movement	72
Turners Hill	Clock Field, North Street, Turners Hill	47	47	47	47	47	488	11/01332/OUT DM/15/2182	18/09/2018	Reserved Matters approved	73
Worth	Land at Holly Farm, Copthorne Way	44	44	44	44	44	268	14/04662/OUT	res to grant	REM application submitted invalid	74
Worth	Land north of A264 at Junction 10 of M23	500	140	140	500	500	38	13/04127/OUTES	res to grant	permission granted 25.05.16	75
Worth	Palmers Autocentre Turners Hill Road Crawley Down	8	8	8	8	8	488	11/03991/OUT 14/04418/REM	09/02/2015	Site cleared	76
	Total		**1408**	**1355**	**1768**	**1714**					
Resolution to grant permission subject to S106											
Burgess Hill	Hook Place, Cuckfield Road, Burgess Hill		8	8	8	8	668			DM/15/5045 8 new homes resolution to grant permission	77
East Grinstead	Meadway Garage, Lowdells Lane, East Grinstead		7	7	7	7	324			DM/16/3264 resolution to grant	78
East Grinstead	Mattells Store, 1-4 Normans Gardens and Queens Road, East Grinstead		121	121	121	121	768			DM/15/5067 resolution to grant permission	79
	Total		**136**	**136**	**136**	**136**					

	Total Permissions		**3191**	**2988**	**4128**	**3749**					
Allocations with no permission											
Ansty & Staplefield (HHNP)	North of Rookery Farm Rocky Lane Haywards Heath	55	55	55	55	55	94			DM/15/3553 pre app for 55 units	80
Ansty & Staplefield (HHNP)	Land south of Rocky lane, west of Weald Rise, Haywards Heath	190	100	45	190	190	496			Np allocations, planning application for 333 units submitted dm/16/4496	81
Ansty & Staplefield	Land south of Bolney Road, Ansty	18	18	18	18	18	629			NP allocation (passed examination) Planning application res to grant subject to s106	82
Ansty & Staplefield	Land south of Barn Cottage, Cuckfield Road, Anty	8	0	0	8	8	626			NP allocation	83
Ashurst Wood	Wealden House, Lewes Road, Ashurst Wood	50	0	0	50	50	471			NP allocation	84
Ashurst Wood	LIC, Wealden House, Lewes Road, Ashurst Wodd	25	0	0	25	25	757			NP allocation	85
Ashurst Wood											86
Balcombe	Land to the west of the Rectory, Haywards Heath Road, Balcombe	14	14	14	14	14	150			NP allocation	87
Balcombe	Land north of Barnfield Cottages, Haywards Heath Road, Balombe	14	0	0	14	14	191				88
Balcombe	Land opposite Newlands, London Road, Balcombe	14	0	0	14	14	188				89
Burgess Hill	The Brow, Burgess Hill	100	100	100	100	100	756			NP allocation MSDC laeding discussions with landowners	90
Burgess Hill	Land at Victoria Road (north), Burgess Hill	80	24	24	80	80	544			Planning application pending for 12 units on part of site. Assumption that there will be another application within 5 years	91
Burgess Hill	Station Yard/ car park, Burgess Hill	150	0	0	150	150	83			NP allocation	92
Burgess Hill	The Oaks Centre, Junction Road, Burgess Hill	12	0	0	12	12	84			LP allocation	93
Burgess Hill	North of Faulners Way, Burgess Hill	20	0	0	20	20	88			NP allocation	94
Burgess Hill	Civic and Cultural Quarter	25	0	25	25	25	92			NP allocation	94a
Bolney	G+W Motors, London Road, Bolney	10	0	0	10	10	82			NP alllocation	95
Bolney	Land opposite Queens Head, Bolney	30	0	0	30	30	543			NP allocation	96
Cuckfield	The Manor House, 14 Manor Drive, Cuckfield	15	0	0	10	10	177				97
Cuckfield	Courtmeadow School, Hanlye Lane, Cuckfield	10	0	0	10	10	480				98
East Grinstead	Ashplatts House, Holtye Road, East Grinstead	45	45	45	45	45	723			NP allocation	99

East Grinstead	Stonequarry Woods, East Grinstead	40	0	0	40	0	96			LP allocation	100
East Grinstead	Junction of Windmill Lane/London Road, East Grinstead	40	0	0	35	35	102			LP allocation	101
East Grinstead	Imberhorne School. Windmill Lane, East Grinstead	200	0	0	200	200	81				102
East Grinstead	67 -69 Railway approach, East Grinstead	7	0	0	7	7	441				103
East Grinstead	Imberhorne Lane Car Park, Imberhorne Lane, East Grinstead	18	0	0	18	18	510				104
East Grinstead	Delivery Office, 76 London Road, East Grinstead	12	0	0	12	12	559				105
Hassocks	Station Yard Hassocks	70	0	0	70	0	106			SSHS DPD	106
Haywards Heath	Downlands Park, Isaacs Lane, Haywards Heath	20	20	20	20	20	750			NP allocation	107
Haywards Heath	Hurst Farm, Hurstwood Lane, Haywards Heath	350	150	150	350	350	246			MSDC owned site, allocated in emerging NP. Planning application expected Autumn 2016	108
Haywards Heath	NCP Car Park, Harlands Road, Haywards Heath	40	40	0	40	40	744			Pre application discussions have been had on this site. Intention to nring site forward for development	109
Haywards Heath	Beech Hurst Depot, Bolnore Road, Haywards Heath	15	15	15	15	15	619			MSDC to bring planning application for the site within the next 12 months	110
Haywards Heath	Caru Hall, Bolnore Road, Haywards Heath	12	0	0	12	12	507				111
Haywards Heath	Land rear of Devon Villas, Western Road, Haywards Heath	10	0	0	10	10	597				112
Hassocks	Hassocks Golf Club, London Road, Hassocks	130	130	130	130	130	690			NP allocation in Submitted Plan. Current planning application expected to be determined in December 2016 DM/16/1775	113
Turners Hill	Old Vicarage field, Turners Hill	44	44	44	44	44	492/553			NP allocation	114
West Hoathly	Land north of Top Road, Sharpthorne	24	0	0	24	24	148				115
West Hoathly	Land adjacent to Cookhams, South of Top Road, Sharpthorne	16	16	16	16	16	477			No movement, advised by Parish Council that expected in first 5 years.	116
West Hoathly	Blubell Woodland, Sharpthorne	15	0	0	15	15	645				117
	Total		**771**	**701**	**1938**	**1828**		-	-		
Sites as identified in the Housing Supply Document											

Haywards Heath	The Priory, Syresham Gardens, Haywards Heath		41	41		0	732			DM/15/3508 for 41 units pending consideration	118
	Total		**41**	**41**							
Small sites with permission (with 30% discount)											
	Total		**304**	**304**							
District Plan Allocation											
Burgess Hill	North Burgess Hill		255	255	3500	2730	493			First application submitted September 2016 140 units	119
Slaugham	Hardriding Farm, Parish Lane, Pease Pottage		450	450	600	600	666			DM/15/4711 application submitted Nov 2015 DM/15/4760 156 units	120
	Total		**705**	**705**	**4100**	**3330**					
		Total	**5012**	**4739**	**10511**	**9252**					

Neighbourhood Plans position on Commitments List (as at 01.12.16)

To be read in conjunction with Commitment Schedule as at 1st October 2016 (attached to this statement and dated 7.12.2016.

Cuckfield (made October 2014)

	Policy Number	Site	Number of units	SHLAA number	MSDC Comment	Is site on commitment list	Years 1 – 5	Remaining plan period
1	CNP6a	Former Court Meadow School	10 units	480	New commitment	Yes – allocations – no PP Line 97	0	10
2	CNP6b	Horsgate House	5 units	649	New small site commitment	Yes – small site total	5	0
3	CNP6c	11 Manor drive	3 units	545	New small site commitment	Yes – small site total	3	0
4	CNP6d	Manor House, 14 Manor Drive	15 units (gross) 11 units net	177	New commitment (permission for 4 units so net number of units is 11)	Yes allocations – no PP Line 96	0	10
	Total number of new units 29 units							
	Forum Position	21 units counted in NP/ Allocations no pp part of commitments schedule as 8 accounted for in small sites						
	MSDC position	Total number of units agreed						

West Hoathly (made April 2015)

	Policy Number	Site	Number of units	SHLAA number	MSDC Comment	Is site on commitment list	Years 1 – 5	Remaining plan period
1	WHCS_05	North of Top Road	24	148	New commitment	Yes allocations – no PP Line 115	0	24
2	WHCS_06	Land adj to Cookhams	16	477	New commitment	Yes allocations – no PP Line 116	16	0
3	WHCS_02	Bluebell Woods	15	645	New commitment	Yes allocations – no PP Line 117	0	15
	Total number of new units: 55 units							
	Forum Position	Agreed						

Hurstpierpoint (made March 2015)

	Policy Number	Site	Number of units	SHLAA number	MSDC Comment	Is site on commitment list	Years 1 – 5	Remaining plan period
1	Hurst H2	Highfield Drive (HP01)	17	2	Permission granted Sept 2014, counted as a commitment before Plan was made	Yes permission not yet commenced – line 64	17	0
2		Chalkers Lane North (HP14)	38	35	Permission granted December 2012 counted as a commitment before Plan was made (site now complete)	Development complete	0	0
3		Chalkers Lane South (HP15)	57	284	Permission granted August 2014, counted as a commitment before Plan was made (under construction)	Yes – large sites were development has commenced – line 27	26 remaining	0
4		Little Park (HP07 and HP08)	140	238	Permission granted Sept 2014, counted as a commitment before Plan was made	Yes – permission not yet commenced – line 63	140	0
5	Sayers Common	To be identified	30 – 40	To be identified	Once sites are identified then will count as a commitment	no	0	0
	Total number of new units	**30 – 40 units**					183	0
	Forum Position	0 units counted in NP/ Allocations no pp part of commitments schedule as no sites identified in Sayers Common						
	MSDC Position	Total number of units agreed. Hurstpierpoint sites have PP so appear in that part of the commitment schedule Sayers Common site still to be identified so does not appear in commitment schedule						

Ardingly (made March 2015)

Policy Number	Site	Number of units	SHLAA number	MSDC Comment	Is site on commitment list	Years 1 – 5	Remaining plan period
ARD3	Standgrove	37	187	Planning permission granted at appeal in April 2014 and counted as a commitment before Plan was made (site under construction)	Yes - large sites were development has commenced – line 3	36	0
Total number of new units	0						
Forum Position	Agreed						

Burgess Hill (made January 2016)

	Policy Number	Site	Number of units	SHLAA number	MSDC Comment	Is site on commit ment list	Years 1 – 5	Remaining plan period
1	TC1	Civic and Cultural quarter	New housing encouraged, unknown amount	92	Part of site allocated in adopted Local Plan for **25** units (BH1). The Neighbourhoo d Plan is not specific about the number of units. No additional units are included for this site.	Yes – line 94a	0	25
2	TC3	The Brow Quarter	**242** units	528 – Martletts redevelop ment (142 units) 756 – The Brow	This site is identified in the SHLAA and covers 2 sites. Part of the site covers the Martletts redevelopment which will	Yes – Martletts in permissi on not yet commen ced – line 36	242	

				(100 units)	deliver 142 units. The second part of the site covers the Brow and is identified in the SHLAA as having capacity for 100 units. Therefore 242 units are included as new commitments.	The Brow is in allocations – no PP Line 90		
3	TC5	Station Quarter	Unlikely to be more than 150	83	This site is allocated in the adopted local Plan for 60 units (BH3), however the SHLAA estimates that this number could be increased with site able to accommodate **150** units, which is already included as a commitment. No additional units are included for this site.	Yes – allocation no PP line 92	0	150
4	S1	Victoria Road	Unknown – estimate 80 from SHLAA	544	Part of this NP allocated is made up of a number of sites that already have permission. The remaining area is identified in the SHLAA as having capacity for 80 units, Therefore 80 units are included as new commitments.	Yes allocation no PP – Line 91	24	56
5	LR1	Leylands	No	88	This site was	Yes –	0	20

		Park	additional		previously allocated for 50 units in the adopted Local Plan (BH6), however the NP allocates this part of the site for **20** units. The remainder of the site is within the Burgess Hill northern arc allocation. No additional units are included for this site.	allocations no PP – Line 94		
	Total number of new units		**322 units**					
	Forum Position		180 units counted in NP/ Allocations no pp part of commitments schedule as 142 in permission not yet commenced part of commitments table					
	MSDC Position		Total number of units agreed. 142 in permission not yet commenced part of commitments table 180 new allocations in NP/Allocations part of commitments schedule					

Crawley Down (Worth Parish) (made January 2016)

No allocations – possible infill		
Total number of new units	**0 units**	
Forum Position	Agreed	

Lindfield and Lindfield Rural (made March 2016)

No allocations – possible infill		
Total number of new units	**0 units**	
Forum Position	Agreed	

Turners Hill (made March 2016)

Policy Number	Site	Number of units	SHLAA number	MSDC Comment	Is site on commitment list	Years 1 – 5	Remaining plan period
THP2	Vicarage Field and the Old Estate Yard	44	492	New commitment	Yes part of allocations – no PP Line 114	44	0
Total number of new units		**44 units**					
Forum Position		**Agreed**					

Twineham (made March 2016)

Policy Number	Site	Number of units	SHLAA number	MDSC Comment	Is site on commitment list
Policy TNP1	Delivery of housing	20	N/A	No specific sites identified windfalls site will be counted as commitments once they have permission. Accounted for in windfall allowance.	no
Total number of new units		**20 units**			
Forum Position		0 units counted in NP/ Allocations no pp part of commitments schedule as the 20 units cited above should be accounted for in windfall allowance			
MSDC Position		Total of units agreed Sites still to be identified so do not appear in commitments schedule			

Ashurst Wood (made June 2016)

	Policy Number	Site	Number of units	SHLAA number	MSDC Comment	Is site on commitment list	Years 1 – 5	Remaining plan period
1	Policy 7	Mount Pleasant Nursery, Cansiron Lane	3 dwellings	Not in SHLAA	New small site commitment	Yes small site commitment	0	0
2	Policy 6	Land between 98 and 104 Maypole Road	5 dwellings	139	New small site commitment	Yes –small site commitment	0	0
3	Policy 8	Willow Trees and Spinney Hill, Lewes Road	4 dwellings	Not in SHLAA	New small site commitment for 3 units, permission already granted for 1 unit.	Yes – small site commitment	0	0
4	Policy 9	Wealden House, Lewes Road (EDF)	50 dwellings	470	New commitment	Yes allocations – no PP Line 84	50	0
5	Policy 10	Wealden House, Lewes Road (LIC)	Not specified assumed 25 in SHLAA	757	New commitment, no amount has been specified but SHLAA assumed 25 units from the site.	Yes allocations – no PP Line 85	25	0

	Total number of new units	**87 units**					
	Forum Position	75 units counted in NP/ Allocations no pp part of commitments schedule as 12 accounted for in small sites					
	MSDC Position	Total number of units agreed					

Albourne (made September 2016)

Policy Number	**Site**	**Number of units**	**SHLAA number**	**MSDC Comment**	**Is site on commitment list**	**Years 1 – 5**	**Remaining plan period**
H2	Land adjacent to the Village Allotments, Hay Lane	2	Not in SHLAA	New small site commitment	Yes – small site commitment	0	0
Total number of new units		**2 units**					
Forum Position	Agreed						

Bolney (made September 2016)

	Policy Number	**Site**	**Number of units**	**SHLAA number**	**MSDC Comment**	**Is site on commitment list**	**Years 1 – 5**	**Remaining plan period**
1	Policy H4a	Former Queens Head Pub	30	543 (part)	New commitment	Yes part of allocations – no PP Line 96	0	30
2	Policy H4b	G+W motors	8 -10 (**2-4** new)	SHLAA 82	This site is allocated in the adopted Local Plan for 6 units, so this allocation represents an increase of 2 - 4 units. Therefore commitment has been increase to 10 units.	Yes part of allocations – no PP Line 95	0	10
3	Policy H4c	Bolney House	3 - 5	SHLAA 711	New small site commitment.	Yes – small site	0	0
	Total number of new units		**35 - 39 units**					
	Forum Position	32 – 34 counted in units NP/ Allocations no pp part of commitments schedule as 12 accounted for in small sites						
	MSDC Position	Total number of units agreed						

Balcombe (made September 2016)

	Policy Number	Site	Number of units	SHLAA number	MSDC Comment	Is site on commitment list	Years 1 – 5	Remaining plan period
1	Policy 2 i	Balcombe House Gardens and Rectory Gardens, Haywards Heath Road	14 units	150	New commitment	Yes part of allocations – no PP Line 87	14	0
2	Policy 2 iii	Barn Field, Haywards Heath Road	14 units	191	New commitment	Yes part of allocations – no PP Line 88	0	14
3	Policy 2 iii	North of Station House, London Road	14 units	188	New commitment	Yes part of allocations – no PP Line 89	0	14
	Total number of new units		**42 units**					
	Forum Position	Agreed						

East Grinstead (made November 2016)

	Policy Number	Site	Number of units	SHLAA number	MSDC Comment	Is site on commitment list	Years 1 – 5	Remaining plan period
1	EG6a	St Lukes	Up to 15 units	439	Permission granted, counted as a commitment before Plan was made	Yes Large site where development has commenced – line 9	14	0
2		1 -15 Bell Hammer	28 units (3 net units)	696	Permission granted, counted as a commitment before Plan was made	No – PP expired Oct 2016	0	0
3		Warrenside	14 units	444	Permission granted, counted as a commitment before Plan was made	Yes	0	0
4	EG6b	Meadway Garage	**9 units**	324	New commitment	Yes – resolution to grant – line 78	7	0

5		Windmill Lane/London Road	Up to 35	102	This site is allocated for housing in the Small Scale Housing Allocations DPD. No additional units are included for this site.	Yes part of allocations – no PP Line 101	0	35
6		Imberhorne Lane Car Park	**18 units**	510	New commitment	Yes part of allocations – no PP Line 104	0	18
7		67 - 69 Railway approach	**7 units**	441	New commitment	Yes part of allocations – no PP Line 103	0	7
8		Post Office, 76 London Road	Up to **12 units**	559	New commitment	Yes part of allocations – no PP Line 105	0	12
9		33 -35 Cantelupe Road (Cantelupe House in NP)	14 units	608	Development completed	Yes - completed	0	0
10		Imberhorne Lower School	Up to **200** units	81	New commitment	Yes part of allocations – no PP Line 102	0	200
11		Ashplatts House	Up to **45** units (new)	723	New commitment	Yes part of allocations – no PP Line 99	45	0
12		Queens Walk	Up to **120** dwellings	768	New commitment	Yes – resolution to grant PP – line 79	121	0
	Total number of new units		**411 units**					
	Forum Position	282 units counted in NP/ Allocations no pp part of commitments schedule as 129 included in resolution to grant – line 78 and 79						
	MSDC Position	Total number of units agreed						

Passed Referendum

Haywards Heath (to be made by Council 14th December 2016)

Policy Number	Site	Number of units	SHLAA number	MSDC Comment	Is site on commitment list	Years 1 – 5	Remaining plan period
H1	Land at Hurst Farm	**350** units	246	New commitment	Yes - part of allocations – no PP Line 108	150	200
H2	Land south of Rocky Lane and west of Weald Rise and Fox Hill Village	**190** units	496	New commitment	Yes part of allocations – no PP Line 81	100	90
H3	Caru Hall	**12** units	507	New commitment	Yes - part of allocations – no PP Line 113	0	12
H4	Rear of Devon Villas	**10** units	597	New commitment, although counted as a SHLAA site in years 1 – 5, so will remove from that source when it is allocated.	Yes - part of allocations – no PP Line 114	0	10
H5	Beech Hurst Depot, Bolnore Road	**15** units	619	New commitment	Yes part of allocations – no PP Line 110	15	
H6	Harlands Road Car Park	**40** units	744	New commitment	Yes part of allocations – no PP Line 109	40	
H7	Downlands Park	**20** Units	750	New commitment	Yes part of allocations – no PP Line 107	20	
Total number of new units		**637 units**					
Forum Position	Total no Agreed – but delivery rates in years 1-5 not agreed and clarification sought on points below						

Forum comment

H6 Harland Car Park is not currently available and cannot be included in the first 5 years

MSDC Position

H6 Harlands Road Car Park – site allocated in emerging Neighbourhood Plan. Pre application discussion indicate that site is likely to become available in the short term.

At Examination

Ansty and Staplefield (Examiners report received to go to Cabinet in November 2016 to approve for referendum)

Policy Number	Site	Number of units	SHLAA number	Comment	Is site on commitment list	Years 1 – 5	Remaining plan period
AS5	Holly Bank	7 units	627	Permission granted, counted as a commitment before Plan was made	Yes – permission not yet commenced – line 34	7	0
AS6	Barn Cottage	**8** units	626	New commitment	Yes part of allocations – no PP Line 83	0	8
AS7	Bolney Road	**18** units	629	New commitment	Yes part of allocations – no PP Line 82	18	0
Total number of new units		**26 units**					
Forum Position	Agreed						

Regulation 16 consultation – At Examination

Hassocks (ended September 2016)

Policy Number	Site	Number of units	SHLAA number	Comment	Is site on commitment list	Years 1 – 5	Remaining plan period
Policy 14	Hassocks Golf Club	**130** units	690	New commitment	Yes - part of allocations – no PP Line 113	130	0
Policy 15	Land to n/o Clayton Mills and Mackie Avenue	**140** units	753	New commitment	No	0	0
Policy 16	National Tyre Centre	**20** units	375	New commitment	No	0	0
Total number of new units		**290 units**					
Forum Position	Agreed						

Regulation 14 consultation

Horsted Keynes (ended 26th May 2016)

Policy Number	Site	Number of units	SHLAA number	Comment	Is site on commitment list	Years 1 – 5	Remaining plan period
HK18	Police House Field	10	216	New commitment	No	0	0
HK19	Land at Jefferys Farm	6	68	New commitment	No	0	0
HK20	Land at Westhall House	(14)	748	New commitment for extra care Don't include numbers as maybe	No	0	0
Total number of new units		**16 units**					
Forum Position	Agreed						

No draft Plan published

Slaugham

Copthorne (Worth Parish)

Summary of Neighbourhood Plan Allocations

Plan	MSDC position on Number of new units allocated	Forum position on Number of new units allocated relative to commitments table now [8]	Status	Settlement category
Cuckfield	29	21	Made	2
West Hoathly	55	55	Made	3
Hurstpierpoint	30 – 40	0	Made	2
Ardingly	0	0	Made	3
Burgess Hill	322	180	Made	1
Crawley Down	0	0	Made	2
Lindfield and Lindfield Rural	0	0	Made	2
Turners Hill	44	44	Made	3
Twineham	20 (windfall)	0	Made	-
Ashurst Wood	87	75	Made	3
Balcombe	42	42	Made	3
Albourne	2	2	Made	3
Bolney	35 – 39	32-34	Made	3
East Grinstead	411	282	Made	1
Haywards Heath	637	637	1st Dec	1
Ansty and Staplefield	26	26	Ref 19th Jan	-
Hassocks	290	290	At Examination	2
Horsted Keynes	16	16	Reg 14	3
Total	**2015 - 2029**	**1702**		
	2020 included in Neighbourhood Plan allocations without planning permission			

[8] The primary difference between the figures are the Forum have separated commitments that appear on the Commitments list and those smaller sites that appear on the commitments list under 'Small Sites'
At Burgess Hill the difference between the figures is as a result of the Forum separating out the NP allocations that appear on the 'permission not yet commenced' part of the commitments list
At East Grinstead the difference between the figures is as a result of the Forum separating out the NP allocations that appear on the 'resolution to grant' part of the commitments list