
Mid-Sussex District Plan

Examination Statement - Housing

Prepared for Members of the Mid Sussex
Developers Forum

7th November 2016

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(Barton Willmore and NLP, October 2016)

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(Savills, October 2016)

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(Judith Ashton Associates, October 2016)

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Introducing the Mid Sussex Developers Forum

The Developers Forum was set up on 15th September as a means of assisting the Inspector, the District Council and other key stakeholders through Mid-Sussex District Council's District Plan Examination. The Forum comprises key landowners, housebuilders and development promoters in the District. Savills has been appointed to represent the Forum on relevant planning matters. The purpose and intention is to positively engage with the District and ultimately improve communication between the industry and the Council to enable the delivery of development. To that end, the Forum has invited the District Council to its Meetings.

The Members of the Developers Forum who have instructed this Joint Written Statement are:

- Countryside (#20318)
- Gleeson Developments (#15705, #20319)
- Hallam Land (#15663)
- Reside Developments (#20082)
- Rydon Homes (#15095, #2335, #15705)
- Taylor Wimpey (#15521)
- Thakeham Homes (#16474, #15692, #20080, #20293)
- Village Developments (#3139)
- Wates Developments (#14681, #17488)
- Welbeck (#20534)

A full list of the relevant Developers Forum land interests is provided in **Appendix 1**.

It should be noted that on some specific matters, individual Members of the Forum will be making separate submissions.

Planning Consultants / Technical Consultants who have inputted:

- Barton Willmore representing Hallam and Welbeck
- DMH Stallard representing Welbeck
- Home Builders Federation (HBF) (#15604)
- Judith Ashton Associates representing Wates Developments
- Nathaniel Lichfield & Partners representing Wates Developments
- Nexus Planning representing Gleeson Developments and Rydon Homes
- Tim North Associates representing Village Developments
- Woolf Bond representing Taylor Wimpey

1. Evidence Base

Q 1.1 Do the West Sussex SHMA (2009), the Northern West Sussex SHMA (2012), the Housing and Economic Development Needs Assessment (HEDNA) (February 2015), the HEDNA Update (November 2015) and the HEDNA Addendum (June 2016) constitute an adequate evidence basis for the OAN?

- 1.1. No. The evidence base is not considered adequate for the assessment of OAN in MSDC, for a number of reasons as follows.
- 1.2. As identified in the Inspector's initial letter of 15th September (**ID1**), the correct recognition of the Housing Market Area (HMA) is fundamental. The Forum has outlined a detailed position with respect of the SHMA in a Technical Note prepared by NLP and Barton Willmore (**Appendix 2**).
- 1.3. Mid-Sussex District Council's letter (**MSDC1**) is heavily reliant upon the 2009 Strategic Housing Market Assessment (SHMA) (**EP23**) and the 2015 Housing and Economic Development Needs Assessment (HEDNA) (**EP20**) on matters relating to Housing Market Areas and the Duty to Cooperate. The Sustainability Appraisal (August 2016) (**BP5**) demonstrates strong commuting links between Mid-Sussex District Council, Brighton & Hove City Council and Crawley Borough Council.
- 1.4. In particular, paragraph 7.44 of the Sustainability Appraisal demonstrates strong migration links between the two authorities (Mid Sussex & Brighton & Hove). Brighton & Hove and Crawley Councils are ranked 1st & 2nd for in and out migration and commuting to and from Mid Sussex. Therefore there is clearly a link between these authorities which needs to be fully investigated.
- 1.5. In terms of migration both Brighton & Hove and Crawley are net exporters of migrants to Mid-Sussex (540¹ & 250² persons respectively 2013) and Brighton & Hove are also net exporters of commuters to Mid-Sussex (516 persons 2011³).

¹ BP 5 Table 18

² BP 5 Table 20

³ BP 5 Table 17

- 1.6. The Sustainability Appraisal and Sustainability Appraisal of Cross Boundary Options (2015) (**EP14**) are Mid-Sussex's latest documents on this matter, considerably more up to date than the 2009 SHMA, and predominately based upon the 2015 HEDNA. It must therefore be a more accurate measure of casual links between the two authorities and a greater gauge of the Brighton & Hove unmet need that MSDC should be accommodating.
- 1.7. Based upon these points, the assertion in MSDC1 paragraph 2 under question 2(i) 'The Housing Market Areas' that the 'inter-relationships with the CWS HMA' (Coastal West Sussex Housing Market Area) are "primarily due to commuting" flows is likely to be inaccurate.
- 1.8. MSDC1 is largely silent on accommodating the unmet housing needs of Crawley Borough Council and relies upon the absent appendices of the **BP17**. Duty to Cooperate statement to address this matter. In this respect it has failed to answer concerns raised by ID1 concerning the lack of clearly calculated figures for unmet need as no evidence based calculations have been brought forward to demonstrate how the needs of both Housing Market Areas have been considered as part of work to establish the District's Objective Assessed Housing Needs (OAN). The total unmet needs are outlined by **Table 4.1** in this Statement. The relevant evidence of unmet needs is contained in BP5 and EP14.
- 1.9. **In summary, the Forum wishes to note that:**
- **The HMA for Mid Sussex overlaps both the North West Sussex HMA and the Coastal West Sussex HMA. This point needs to be recognised by MSDC.**
 - **That CLG projections do not already reflect unmet housing needs in anyway.**
 - **That a clear, and unfettered OAN has not been demonstrated in the MSDC evidence base. It is the case that unmet needs exist from Brighton, Crawley, Lewes and Wealden, all of which need to be openly acknowledged by MSDC as a starting point for plan production.**

2. Calculation of the OAN

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

2.1. No.

2.2. The calculation of the starting point of 714 households per annum is sound as this is based on the most recent ONS 2014-based Population Projections and DCLG 2014-based Household Projections. However it is necessary to account for a dwelling vacancy rate, which means growth of 714 households per annum translates into a need for 730 dwellings per annum. This has been acknowledged by the Council in the HEDNA Addendum (**EP22**, paragraph 1.62). The figure of 714 household per annum represents the starting point, and not the conclusion on either likely demographic-led needs (following adjustment for household formation rates in line with PPG ID2a-015) or full OAN. The Planning Policy Guidance (PPG) sets out the starting point must be unconstrained, and may need to be adjusted to reflect other demographic, economic, market signals and affordable housing factors (ID2a-004). In addition, the past under delivery of housing in Mid Sussex to 2014 (see **Table 7.1**), is an influence over economic/ market signals.

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

2.3. No.

2.4. The Forum fundamentally disagrees that that MSDC has applied PPG correctly in arriving at an Objectively Assessed Housing Need (OAN) figure that reflects market signals and have provided an additional supporting technical statement prepared by Barton Wilmore and Nathaniel Lichfield & Partners on this matter (see **Appendix 2**). **MSDC 1** does not address the Inspector's initial concerns regarding worsening affordability and instead MSDC has sought to use the latest population projections to argue that they cannot provide any further housing due to constraints. Whilst MSDC notes that completions have fallen below the former South East Plan 'target' of 855 dpa, the outstanding commitments in excess of 4,000 units that are suggested to have contributed to undersupply would still have resulted in a shortfall of delivering a five year land supply if provided and is indeed further evidence of under-supply (the Forum's position on commitments is provided in **Appendix 5**).

- 2.5. The HEDNA (**EP20-22**) does not make appropriate adjustments to reflect affordability issues, trends and market signals. The 24 dpa uplift is wholly insufficient to factor in a number of necessary adjustments, including (please see **Appendix 2**): -
- The calculation conflates an adjustment to household formation rates (which should form part of the demographic-led needs as set out in PPG ID-2a015) with market signals (a supply-side adjustment which could be expected to improve affordability as set out in PPG ID: 2a-020). As an uplift of 24 dpa is derived based on returning to 2008-based headship rates, this effectively means that no market signals uplift has been applied;
 - The PPG (ID: 2a-020) is clear that the scale of uplift should be set at such a level that it could be expected to improve affordability. Given the market signals pressures faced in Mid Sussex it is unlikely that an increase of just 24 dpa would have any meaningful impact on affordability;
 - The scale of uplift also wholly fails to reflect the 'Rate of Development' market signal (PPG ID: 2a-015) which is particularly poor in Mid Sussex (see response to Q7 in this Statement); and
 - The OAN does not reflect any adjustments to demographic change, including changing population trends and consistent cross-boundary migration assumptions with Greater London which will likely increase population growth and the need for housing in the District due to the pressures faced in London itself.
- 2.6. There are notable examples of other Districts where Local Plan Inspectors have endorsed specific market signal adjustments to demographic-led needs have been made to reach the full OAN, including for example Eastleigh (10%) and Canterbury (20%). Whilst Cambridge has proposed a 30% market signals uplift in response to their Inspector's preliminary findings on market signals.
- 2.7. MSDC has relied on the Inspector's Report into the Examination of the Horsham District Planning Framework (HDPF) to justify not increasing the housing need in relation to market signals. The outcome with respect of housing needs in Horsham does not reflect the situation in Mid Sussex District, notably owing to the poor past delivery of housing in Mid Sussex. Regardless of whether the Inspector's comments on the Horsham Examination in Public were justified, or are relevant to the circumstances in Mid Sussex, the PPG is clear on the way in which market signals should be applied to OAN and Mid Sussex have not followed this guidance.

- 2.8. As set out in the Report in **Appendix 2** a much greater uplift is needed, of around 25% of the demographic-led needs (which should already include adjusted headship rates to reflect past suppression of household formation amongst younger age groups). This reflects a combination of economic, market signals and affordable housing factors, notably the extent of past under delivery (to 2014).
- 2.9. In addition there is little logic to the MSDC conclusion that uplift in housing supply would have no material effect. In addition there is little logic to the MSDC conclusion that uplift in housing supply would have no material effect on affordability. As acknowledged by MSDC there is a clear relationship between increases in private housing supply and affordability (MSDC1 at page 6). Even if, as MSDC argue, an increase in housing supply would not reduce the ratio of lower quartile house prices to earnings to a level below that of England or West Sussex, the ratio would, nonetheless be reduced. MSDC's approach appears to be to argue that because the affordability ratio is high (i.e. a high level of house prices in relation to earnings), increasing housing supply will not cause the ratio to reduce to a level which accords with relevant averages. The approach is inconsistent with the PPG. The PPG (paragraph ID2a-020) advises that *"plan makers should increase planned supply by an amount that, on reasonable assumptions and consistent with principles of sustainable development, could be expected to improve affordability."*
- 2.10. MSDC needs to apply market signals in the way stipulated by the PPG, and not simply project forward any worsening signals. The Forum notes that the PPG (ID 2a-021) states *"A worsening trend in any of these indicators will require upward adjustment to planned housing numbers"*. The 25% adjustment outlined is wholly justified. This will deliver homes to create past in balances and mitigate the effects of the past suppression of delivery. This figure could also be reached when considering other factors which contribute to OAN as discussed in this Written Statement.

Q 2.3 Do the calculations adequately reflect projected jobs growth?

- 2.11. No.
- 2.12. **MSDC1** outlines that MSDC enjoys a close working relationship with its neighbours on employment matters through the Greater Brighton Economic Board and the Gatwick Diamond. MSDC has been positive regarding its ability to accommodate growth in floorspace to assist in meeting unmet employment needs from neighbours but has not been so embracing accommodating housing needs. A growth in employment floorspace coupled with inadequate housing supply will lead to an unbalance between the two and will contribute towards unsustainable travel patterns.

- 2.13. Two of the Council's most recent economic studies show job growth in Mid Sussex is forecast to be in the region of 500 jobs per annum. However the HEDNA Addendum (**EP22**) shows that the proposed OAN would support job growth well below this (323 jobs per annum), and the Council justify this lower growth based on the expected employment land supply during the District Plan period (i.e. a land-supply led approach).
- 2.14. Furthermore, the November 2015 HEDNA report (**EP21** paragraph 7.11) refers to updated economic forecasts in the Burgess Hill Employment Sites Study (BHESS, EP36), and concludes that the baseline economic forecast is 478 jobs per annum, 2011-2031, rather than 521 jobs per annum (as shown earlier in EP35 (i) (published April 2014)). However analysis of the forecast set out in the BHESS, within Appendix 2, has shown that the number of jobs has been incorrectly reported by the authors of the BHESS report. The correct figures, confirmed by the source of the forecasts (Experian Economics) show the BHESS forecast to average 644 jobs per annum, 2011-2031, rather than 478 jobs per annum as reported. The assessed job range set out in EP35(i) and EP36 is therefore 521-644 jobs per annum, 2011-2031.
- 2.15. Table 3.11 on page 57 of the BHESS reports 73,029 jobs in 2030. However it has been clarified with Experian Economics (also see **Appendix 2**) that the number of jobs projection for 2030 was actually 76,120 jobs (76,700 in 2031); significantly higher than the figure quoted in Table 3.11 of the BHESS. The result of this error is that the MSDC evidence base is flawed and should include a projected job growth of 647 jobs per annum (2011-2030) or 644 jobs per annum (2011-2031). The overall range of job growth in the Council's evidence base should therefore be 521 jobs per annum (Economic Growth Assessment, 2014) to 644 jobs per annum (BHESS), 2011-2031.
- 2.16. **In summary, the Forum wishes to note that the OAN and housing requirement for Mid Sussex should be increased due to the OAN not fully taking into account:**
- **Market Signals**
 - **Economic Signals (Projected Growth)**
 - **Affordability**
 - **Need to increase supply of affordable housing**
- 2.17. **The failure to consider the above factors fully when reaching a baseline OAN is inconsistent with the PPG and is fundamentally flawed. An uplift of 25% to at least 1,000 dpa is required.**

2.18. In addition, the unmet needs of surrounding Local Authorities are relevant, as outlined in response to Question 4. These are in addition to the OAN.

2.19. The Council have not used the proper approach to reaching a reliable housing target/OAN. The PPG is clear that this is a two stepped approach in which the Council must firstly fully investigate an unconstrained total housing need for the District, including appropriate uplifts for the factors discussed. Only once this total unconstrained need has been established should be OAN be considered in light of the constraints within the District⁴. MSDC has clearly not followed this methodology and their calculation of OAN is therefore fundamentally flawed. MSDC1 was unable to rectify this fundamental error. MSDC must move to rectify this situation as part of this Examination process via Main Modifications.

⁴ See Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited [2014] EWCA Civ 1610 & Hunston Properties Limited v. (1) Secretary of State for Communities and Local Government and (2) St Albans City and District Council [2013] EWHC 2678 (Admin).

3. The Duty to Co-operate

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

3.1. The Forum does not advance an argument that there has been a failure to comply with the Duty to Cooperate (DtC). Any previous representations made questioning whether the DtC had been complied with are now withdrawn by Forum members.

4. Unmet Need

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

4.1. **MSDC1** recognised the ‘very large’ unmet needs from neighbouring and nearby authorities. **Table 4.1** outlines the position, which stands at circa 2,300 dpa. A majority of the Local Plans nearby are now adopted and hence ‘up to date’ which places further emphasis on MSDC. It is therefore surprising that the District Plan now makes a reduced provision for the unmet needs of Crawley and no (obvious) provision at all for the unmet needs of Brighton.

Table 4.1: Housing Need of Nearby or Adjacent Authorities

	A	B	C	D
Local Authority	Adopted Plan-Planned Housing & Period	Up to date plan*	Up to date OAN or Population Projection where no up to date SHMA*	Difference (A-C)
Brighton & Hove	660 dpa . March 2016 (2016-2030)	Yes	1,506 dpa (OAN Jun 2015)	-846 dpa
Crawley	340 dpa . Dec 2015 (2015-2031)	Yes	675 dpa . (SHMA Mar 2015)	-335 dpa
Horsham	800 dpa (Nov 2015 2016-2031)	Yes	650 dpa (OAN May 2015)	+ 150 dpa
Lewes	345 dpa . May 2016 (2010-2030)	Yes	520 dpa . (OAN Apr 2014)	-175 dpa
Mid Sussex	494 dpa . May 2004 (1989-2006)	No	754 dpa . (HEDNA Aug 2016)	-260 dpa
Reigate and Banstead	460 dpa . July 2014 (2012-2027)	Yes	640 dpa (Inspector’s report into CS 2014)	-180 dpa
Tandridge	125 dpa . Oct 2008 (2006-2026)	No	470 dpa (OAN Sep 2015)	-345 dpa

Wealden	450 dpa. Feb 2013 (2006-2027)	Yes	736 dpa (SHMA Oct 2015)	-286 dpa
				-2,277 dpa

**Up to date is post March 2012.*

Population projection based on a blended average of 2008, 2011 and 2012 ONS Population Projections.

4.2. The Council must make a provision towards meeting the unmet need from Brighton & Hove and Crawley. The Sustainability Assessment of Cross Boundary Options (**EP14**) informed the Sustainability Appraisal (**BP5**) provides the only evidence base on the matter. Based on page 56 of BP5, the extrapolated unmet need for the period 2011-2031 is provided. This information provides a split of internal mitigation and travel to work data which can be used to judge the relationship of the unmet needs to Mid Sussex. The acknowledged unmet needs are now known to be 185 dpa for Crawley (as Horsham as accounted for 150 dpa) and 846 dpa for Brighton. The following range of unmet needs based on both travel to work data (higher number) and internal migration data (lower number) would follow:

- Brighton & Hove (Unmet needs) (of which internal migration is 20.37% and travel to work is 37.1%):
172 - 313 dpa
- Crawley (Unmet needs) (of which internal migration is 34.5% and travel to work is 63.5%) : **64 - 117 dpa**

4.3. Appendix 7 of the Sustainability Appraisal (**BP5**) contains an email from BHCC to MSDC in relation to the change of OAN in the District Plan from 695 dpa to 800 dpa and the implications of MSDC reducing their contribution towards meeting the 'unmet housing needs of adjacent authorities' from 105 dpa to 46 dpa. The email details the significant unmet needs of Brighton & Hove and acknowledges that "whilst the full unmet need is unlikely to be fully resolved, the reduction in surplus housing available from Mid Sussex to assist with that shortfall is regrettable". Brighton & Hove highlight that the reasoning behind reducing the contribution to unmet need is based on a lack of available and deliverable sites however MSDC "are aware of additional sites that may become available for the period after 2021" which would come forward through a Site Allocation DPD. BHCC therefore request that Mid Sussex clarify in their District Plan that the proposed housing target is a minimum in order to demonstrate their commitment to seeking additional housing sites through the proposed site allocation DPD.

- 4.4. In respect of Horsham District the Inspector determined that the HDPF should accommodate 150 dpa of Crawley's unmet needs. It was recognised at the time that this was on the basis of Mid Sussex accommodating the balance of the unmet needs, as part of Mid Sussex is located within the same Housing Market Area (this balance now stands at 185 dpa).
- 4.5. As discussed previously in Section 2, the failure of MSDC to fully take into account the unmet needs of the neighbouring authorities is another factor justifying the increase in OAN of 25%. In fact, this unmet need should be considered to be in addition to the uplift required for market signals (25%). This would increase the OAN above at least 1,000 dpa.

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

- 4.6. The Forum has seen no evidence, whether relating to the DtC or otherwise, which shows how such calculations have been undertaken. MSDC should respond on this matter. The starting point should be recognition of the relevant unmet needs. The second step would be an analysis of whether these needs in part or full may be accommodated in sustainable locations.
- 4.7. **Overall, the Forum wishes to note that substantial unmet needs from Brighton & Hove and Crawley exist, of which a reasonable proportion is related to travel to work, or in-migration patterns and hence is directly related to Mid Sussex (range 236 – 430 dpa).**

5. Affordable Housing

Q5.1 Will the housing requirement be sufficient to ensure that the District's affordable housing needs are met?

- 5.1. The District Plan incorporating focused amendments and further modifications (**BP1**) sets out that based on the plan provision of 800 homes per year in Mid Sussex, the net annual affordable housing need ranges from 191 (meeting affordable housing reasonable preference group's needs) to 294 (total affordable housing waiting list needs) homes per year. Over the plan period this results in a total of 3,247 - 4,998 units.
- 5.2. For the two reasons discussed in paragraph 5.3 the Council has incorrectly calculated the affordable housing need which subsequently makes the housing requirement appear to be meeting almost all affordable housing need. This is not the case. This matter is discussed in more detail in **Appendix 2**.
- 5.3. Firstly, the Council's calculations uses net (rather than gross) household formation (contrary to PPG ID: 2-025); this incorporates double-counting since household dissolution will also be counted as re-lets. Secondly the calculation includes 1,223 units of committed affordable housing supply⁵. At the time of the assessment, this is yet to be delivered and should therefore not be used to offset the need. This is not least of importance due to the potential for double-counting, since if the Council's need figure were to be compared to supply over the plan period (without omitting the 'committed supply' units that fed into the calculation of need) this would double-count those committed supply units. Correcting for these two factors in the calculation results in an affordable housing need in the range 371-474 affordable homes per annum (6,307 – 8,058 over the Plan Period), which is around half of the Council's current proposed housing requirement and unlikely to be met based on the current policy approach to securing affordable housing. The scale of affordable housing needs should have had an important influence in deriving the full OAN, but unfortunately appears to have been based on an underestimate of affordable housing need within the HEDNA process. Affordable housing needs are an important influence on the OAN⁶.

⁵ Pg 24 step 3.3 and Table 17 & 18 EP21 – HEDNA Update

⁶ See Borough of Kings Lynn & West Norfolk v SSCLG [2015] EWHC 2464 (Admin)

- 5.4. Based on the 30% policy compliant provision, the present Plan (800dpa) will only likely deliver 3,672 affordable housing dwellings over the Plan Period (factoring a 10% discount rate for smaller sites of below 10 dwellings which do not contribute to affordable housing provision). This is between 46 - 58% of what is actually required. Based on the emerging housing trajectory, the situation will mean that only circa 1,119 affordable dwellings will be delivered in the five year supply, 224 per annum, around 47% - 60% of the requirement.
- 5.5. **Overall, the Forum wishes to note that on the basis of our estimate of the need for affordable housing being between 371-474 dpa, MSDC would need a total of 1,236 dpa to meet this need based on a 30% affordable housing provision.**

6. The Ability of the Market to Deliver

Q 6.1 Can the market deliver the requirement set out in the submitted plan? What would be the implications of a higher housing requirement for market deliverability?

- 6.1. There is significant development industry interest in Mid Sussex, exemplified by the formation of the Developers Forum. Sales values are typically in excess of the median estimated value £300 per sq ft. This is sufficient to fund new development and proportional infrastructure.
- 6.2. **Appendix 3** includes Mid Sussex Market Capacity Technical Note, prepared by Savills.
- 6.3. In Mid Sussex, housing delivery has averaged 600 dpa over the period from 2012/13 to 2014/15. Analysis of Energy Performance Certificate registrations for new dwellings indicates that this level of delivery has been substantially exceeded over the last 12 months, with annual delivery at approximately 830 in Mid Sussex for the year to March 2016 and 960 for the year to September 2016.
- 6.4. Housing delivery in Mid Sussex is therefore already at the level required to meet the proposed District Plan housing requirement, and easily within the range to meet the levels required to meet a housing requirement of 1,000 dpa + (as advocated by the Forum). This is an achievable level of deliverability as shown by recent trends and market capacity has not prevented delivery reaching this level.
- 6.5. Delivery of 1,000 dpa in Mid Sussex is equivalent to adding circa 1.6% to housing stock each year. This level of housing delivery or a higher level was achieved across a number of Boroughs/Districts in the south of England in the three years leading up to the 2008 downturn. Most of these Boroughs/Districts are either similar or weaker housing markets compared to Mid Sussex. In addition there are currently approximately 1,000 units which are at appeal or with the Secretary of State and in **MSDC1** it is clearly stated that the Council are relying on at least 50% of these units to be granted permission and to come forward. Therefore to be relying on these units coming forward the Council must be confident of their deliverability.

- 6.6. Cambridge and Aylesbury Vale were the only two Local Authorities to have delivered new homes at a rate in excess of 1.5% of stock in 2014/15. Whilst Cambridge is a stronger housing market than Mid Sussex, with a greater scarcity of supply relative to demand, Aylesbury is a weaker housing market. A key justification MSDC have made for not being able to deliver a higher number of units is that the District Plan relies on a number of large strategic sites. However the neighbouring authority of Horsham which is within the same HMA as Mid Sussex is currently delivering at or over 150 dwellings per year two large strategic sites west of Crawley and Horsham⁷. It is therefore realistic to predict that Mid Sussex, an area with a better infrastructure network than Horsham, can also deliver at similar rates.
- 6.7. The analysis in **Appendix 3** shows that housing delivery at the level required to meet need in Mid Sussex has been achieved elsewhere, including in weaker housing markets where the scarcity of new homes supply is less acute. Therefore, market capacity should not be considered a constraint to delivering 1,000 dpa + in Mid Sussex.
- 6.8. By increasing the housing target and therefore allowing the number of houses delivered in the District to be increased the choice in the market will be improved as will the distribution of housing units, something which is currently being limited by the Neighbourhood Plans in Mid Sussex. It is demonstrated in **Appendix 1** that the Forum controls a significant number of sites, which can contribute to significantly increasing the supply of housing.

⁷ 2015/16 delivery at Kilnwood Vale is 149 dwellings (projected three year average 150 dpa). 2015/16 delivery West of Horsham is 320 dwellings (projected three year average is 239 dpa).

7. Past under-delivery

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

- 7.1. The evidence supporting the housing requirement should be adjusted. In reaching a proper unconstrained OAN for the District, account needs to be taken of the past under delivery to 2014. This is a market signal (as set out in the PPG (ID2a-019 bullet 5).
- 7.2. **Table 7.1** demonstrates that housing delivery has historically fallen behind the requirement. As outlined MSDC delivered 3,658 dwellings against a requirement of 6,840 between 2006 and 2014 at an average of 457 dpa. This represented a shortfall of 3,182 dwellings or the delivery of only 53% of the required numbers of housing to 2014.
- 7.3. Although past under delivery is a market signal and therefore an adjustment to the OAN should be made in relation to this under delivery, this should not be simply added onto the need over the plan period to increase the overall requirement (as set out in PPG ID2a Paragraph 19). This was clarified in a High Court Judgment⁸ 'which established that it was not the correct approach to add on shortfall prior to the period for which current housing needs have been modelled/assessed, stating that to do so would involve *"mixing apples and oranges in an unjustifiable way"* (para' 95).

⁸ See Zurich Assurance Limited and (1) Winchester City Council (2) South Downs National Park Authority [2014]EWHC 758'

- 7.4. The PPG reflects past under-delivery in the OAN assessment through the need to take into account market signals. Under-delivery historically will have informed these market signals, for example high and rising house prices (and/or rents), poor and worsening affordability or increases in overcrowding, concealed families and homelessness. In addition the 'rate of development' is a market signal in its own right, reflecting a supply-side signal of where actual supply fell below planned supply. These indicators inform the level of market signals uplift which should be applied in the calculation of OAN, meaning a properly derived OAN will already reflect past under-delivery (given the greater degree of past under-provision, the more likely market signals will be worse and the greater uplift should be applied). This is why it is fundamentally important that the Council's OAN incorporates a market signals adjustment which sufficiently responds to market signals. However, this has not been done since the Council's full OAN represents only a 24 dpa increase on the household projections, an uplift which is wholly marginal and fails to reflect the sheer scale of past under-provision (as well as the chronic problems of affordability revealed by market signals).
- 7.5. A historic legacy of under-performance with a growing future demand dictates a need to significantly increase housing supply to address future delivery. Based on the MSDC position, the base five-year requirement is 4,000 dwellings (800 dpa). The addition of a shortfall since 2014 (102 dwellings based on MSDC requirement, at least 512 based on Forum requirement) and a 20% buffer of 820 (MSDC) and 902 (Forum) dwellings bring the five year requirement to 4,922 – 5,414 dwellings. This is above the historic performance of delivery, but as outlined there is market capacity to achieve this. Furthermore, the acknowledged demand arises, in part, from in-migration from Crawley and Brighton, locations within the same HMA, with acknowledged unmet needs.
- 7.6. MSDC has published Annual Monitoring Reports (AMRs) that review the progress of the Local Development Framework including statistics on housing completions. From 2006 to 2013, the housing target for Mid Sussex was determined by the South East Plan. From 2014 onwards, the housing target has been determined by the emerging evidence base (which is disputed, as per this Written Statement). The anomaly year was 2013/14, which predates the up to date evidence. The Forum notes that in this year, housing delivery was still 319 dwellings below the South East Plan requirement. For the purposes of the analysis, 2014 has to be used as the base date.

Table 7.1: Housing Completions & Housing Delivery Performance 2006 to date

Year	Housing target	Council completions/ projected completions	Council completions / Housing target difference	Council cumulative performance	Forum Housing Target from 2013	Forum completions/ Housing target difference from 2013	Forum Cumulative performance from 2013
2006/07	855	337	-518	-518			
2007/08	855	502	-353	-871			
2008/09	855	480	-375	-1,246			
2009/10	855	353	-502	-1,748			
2010/11	855	179	-676	-2,424			
2011/12	855	522	-333	-2,757			
2012/13	855	749	-106	-2,863			
2013/14	530	536	-264	-3,127	855*	-319	-3,182
2014/15	800	630	-170	-170	1,000	-370	-370
2015/16	800	868	+68	-102	1,000	-132	-502

*The Forum notes the revocation of the South East Plan on 31st March 2013. The interim housing target of MSDC (530 dpa) was not tested nor based on evidence. Therefore, the Forum's position is that in the absence of up to date evidence, the South East Plan figure should be used for 2013/14, prior to the up to date housing evidence, which has a base date of 1st April 2014.

8. Site selection and housing distribution

8.1. The Forum is not intended to be site specific, and therefore no comments on the housing distribution are made. The Forum does not wish to respond on Questions 8.1, 8.3 or 8.4. The following is however noted:

- There is evidence that Parishes in the production of Neighbourhood Plans are not embracing their individual housing needs and hence the HEDNA;
- That the reliance on the Localism agenda via only the Neighbourhood Plans is laudable, but will fail to also deliver sustainable development and the presumption in favour;

8.2. There is significant potential for additional site allocations. Each Forum member has available land, which has been promoted for development (over 6,000 dwellings as omission sites, see **Appendix 1**).

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

8.3. It is clear that paragraph 47 of the NPPF is to be read as requiring a two-stage approach. The OAN is to be established first and to be given effect in the local plan save only to the extent it would be inconsistent with other NPPF policies⁹.

8.4. The question of the concept of environmental capacity and the potential for “tipping point” should not be addressed at ‘stage 1’, namely establishing the OAN. At stage 2 it is legitimate to ask whether any adverse impacts of meeting OAN would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework when taken as a whole, or specific policies in the Framework indicate development should be restricted. Stage 2 cannot be addressed until Stage 1 has been completed.

8.5. The ‘Tipping Point’ is said to be where negative impacts are greater than positive impacts (BP 5 paragraph 7.90). There are a number of fundamental flaws with both the approach and its application:

⁹ Gallagher v. Secretary of State [2014] EWCA Civ 1610 at paragraph 16

- 8.6. A simple balance between negative and positive impacts is inconsistent with paragraph 14 of the NPPF, which states that local plans should meet objectively assessed needs unless any adverse impacts 'significantly and demonstrably outweigh the benefits'. That test has not been applied.
- 8.7. The 'Tipping Point', as selected, is said (BP5 paragraph 7.91) to be based upon the Sustainability Appraisal of Cross Boundary Options (EP14). Option C is said to be the tipping point, and reliance is placed upon the distinction drawn (in EP14) between minor and significant effects (BP5 page 93). A tipping point based upon exceeding the amount of housing development which would give rise to minor effects, would be inconsistent with paragraph 14 of the NPPF.
- 8.8. The distinction drawn between the level of housing provision which would give rise to significant, as distinct from minor, effects is based upon a broad assumption (EP14 paragraph 5.3), and does not provide a sound basis for drawing a distinction in the form of a 'tipping point', and fails to allow benefits to be weighed against impacts.
- 8.9. MSDC are using the 'tipping point' as a cap despite the Council stating that the tipping point is not defined by an absolute figure. This was highlighted when MSDC's OAN figure increased at the same time the Council's residual housing provision for Crawley Borough Council went down.
- For the reasons given, the use of a 'tipping point' is:
 - inconsistent with paragraph 14 of the NPPF.
 - not based upon sound evidence
 - is used as 'cap' which is inconsistent with, and serves to frustrate, the two stage approach contained in paragraph 47 of the NPPF

The Strategic Housing Land Availability Assessment (SHLAA)

- 8.10. The Forum agrees with the initial determination of the Inspector in **ID1** that the SHLAA needs to be revisited.
- 8.11. The Forum would question the assertion that the methodology used in the adopted SHLAA is demonstrably robust. This cannot be the case if the Development Management team at the Council are recommending that planning permission be granted, or the Council are resolving to grant planning permission, on sites that were considered unsuitable for development in the SHLAA. Paragraph 14 of the NPPF (the presumption in favour), must be consistently applied.
- 8.12. Furthermore, as outlined by **MSDC1**, it is clear that the Council accepts that a large number of proposals are the subject of appeals and be can reasonably assumed to be granted permission which suggests an element of reliance on 'planning by appeal' to deliver housing. The Forum considers this to be unfair and unreasonable on the communities who live in the District but also on those who are looking to invest in it. Everyone benefits from certainty, not least the Council who will see reduced appeal costs and greater time available for officers to deliver housing.
- 8.13. The Forum questions why **MSDC1** does not refer back to the Land Use Consultants (LUC) reports. The LUC reports; in particular **EP29** – 'Review of Landscape and Visual Aspects of Site Suitability' provide a detailed critique of the sites identified in the SHLAA and identifies a number which, from a landscape suitability perspective, it considers suitable for development. The LUC report should be read with caution as it is focused on landscape only provides a snapshot in time in respect of site suitability. Given the comments in **MSDC1**, the Forum considers that the SHLAA is not fit for purpose. The SHLAA is considered to be too rigid, contains limited or no analysis and identifies constraints but gives no consideration to whether they are resolvable. It needs to be grounded in NPPF paragraph 14, and seek to assist the future allocation of sites and the Neighbourhood Plan process. This will be dealt with in more detail in individual Statements from Forum members.
- 8.14. In addition, page 14 of **MSDC1** states that in some cases there is no evidence, aside from the allocation, that sites in Neighbourhood Plans will come forward. If this is the case, irrespective of the status of the Neighbourhood Plan, the Council should not be looking to rely on such sites as part of their housing sites as they cannot be said to be deliverable.

- 8.15. There are examples of sites being discounted in the SHLAA and subsequently receiving a resolution to grant. For example in Crawley Down, SHLAA site reference 271 has resolution to grant for 30 units and site ref 281 for 60 units.

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

- 8.16. Yes. But it is too early ahead of resolving the OAN to determine this.
- 8.17. The District Plan requires an expressed spatial strategy however in order to be able to develop such a strategy the Council need a robust starting point for the baseline OAN and a housing target which reflects the OAN and appropriate constraints. The District Plan should identify minimum housing targets for settlements or neighbourhood plan areas (as appropriate) in order to guide site allocations and ensure distribution of development. However whilst the Forum support this mechanism, it is the Forum's view that, in addition, the District Plan should include further site allocations rather than waiting for a separate Site Allocations Plan. This would represent positive plan making.
- 8.18. Neighbourhood Plans are now made. The August 2016 Further Modifications to the Plan (**BP1**) outlined that Neighbourhood Plans should deliver 2,262 dwellings over the plan period (Policy DP5). The Neighbourhood Plans account for allocations of circa 2,600 dwellings, however, circa 1,000 dwellings are already accounted as commitments in Mid Sussex's calculations. Therefore the Neighbourhood Plans made, and at submission, together with the SHLAA sites identified in **BP18** are cumulatively circa 604 dwellings short of the District Plan requirements (As shown in **Appendix 4**).
- 8.19. The Council have stated the lack of site allocations is due to a lack of available sites; however the Forum members alone have available sites which should be considered for allocation (see **Appendix 1**). Delaying the allocation of further sites without full assessment of all of the available sites and consideration of all potential options will unnecessarily delay the delivery of housing and negatively impact the five year supply of the District. The process currently being put forward by the Council does not consist of positive plan making and has not been justified.

9. Trajectories

9.1. The Forum has no comment to make on Question 9.1.

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

9.2. The Forum has addressed this matter, in part, in Section 8.

9.3. Based on the current five year housing land supply and the supply which would be available on adoption of the District Plan (as is currently), the Council cannot demonstrate they have sufficient supply to meet the housing needs of their District. Therefore the plan as submitted is unsound. The deficiency can be addressed by allocation of sites so as to enable the District to meet their housing requirements in the short and longer term.

9.4. MSDC has stated that they are committed to preparing a Site Allocations DPD, however this conflicts with the Council's earlier assertion that there are no suitable sites to deliver a greater housing requirement. As outlined in Section 8, there are sites available which have not been fully assessed by MSDC. In addition to this the Council's logic that new sites will have become available by 2021 does not appear to be supported by any evidence. Therefore in light of sites being available now and no reasoned or evidenced justification for the Council to wait to allocate sites, the Council should revisit the site assessment and allocation process and consider new sites for allocation in the District plan.

9.5. The Council's strategy of preparing a site allocations plan in the future is inconsistent with the actual availability of sites and in order to ensure deliverability additional sites should be allocated now, allowing for the District to demonstrate a five year housing land supply on adoption of the Plan.

10. Five year housing land supply

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

- 10.1. Given the clear and persistent under-delivery of housing, the 'Sedgefield method' is the most appropriate as this accord with the NPPF and this is clearly set out in the PPG. The Forum can see no good reason for departing from this guidance.
- 10.2. MSDC have themselves used a 20% buffer, acknowledging the past under delivery of housing. Following the Inspector's letter (**ID1**) the Forum has anticipated updated five year land supply reporting from MSDC based on the Sedgefield method. No up to date position was included in **MSDC1**.
- 10.3. MSDC have not provided a robust reason for spreading the delivery of housing over the plan period this also not in compliance with the PPG. In relation to large sites, the allocation of a few large sites does have the potential to stunt delivery particularly in the short term however this does not warrant spreading the under delivery of sites over the plan period. There is nothing significant within the District Plan which prevents strategic sites coming forward and therefore this will be limited only by market conditions and physical build timescales.
- 10.4. However the Council's approach of allocating only large strategic sites with long lead times and its reliance on Neighbourhood Plans to allocate small sites will affect the five year supply of the District. MSDC's arbitrary threshold of 500 dwellings for strategic sites is a flaw in housing strategy and should not be a justification for the under provision of housing. There are many sites capable of accommodating 50-100+ dwellings that could provide the District with a source of housing supply in the next five years, but are not identified by MSDC as strategic, nor are present in Neighbourhood Plans. Identifying these sites now, rather than relying upon appeals or a Site Allocations DPD in 2020/21 would demonstrate an effective, positive and proactive approach to housing delivery.

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

10.5. **Table 10.1** provides a summary of Five Year Housing land Supply in MSDC. This outlines differences in the projected housing trajectory, which is based on Savills' analysis of the overall trajectory. The anticipated delivery trajectory outlined by the Forum is provided in **Appendix 5**. This indicates that only Pease Pottage is anticipated to deliver at a faster rate than MSDC's projections (assuming a resolution on the submitted planning application), all other major sites (notably Northern Arc), will likely deliver at a slower rate. The relevant Forum members have submitted separate representations with respect of the trajectories for Pease Pottage and Northern Arc. Please note that the trajectory for sites as set out in table 10.1 is not agreed by all parties and is included on a without prejudice basis. Relevant Forum members have submitted separate representations with respect of the trajectories for Pease Pottage and Northern Arc as appropriate.

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

10.6. The level of under provision is dependant on the housing requirements applied; the South East Plan target has not been applied uniformly by MSDC. The Forum have used the South East Plan target, as the last tested housing requirement, to calculate the under provision. **Table 7.1** outlined the housing delivery position from 2006 to date. The level of under provision was 3,182 dwellings at 1st April 2014.

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

10.7. It is the view of the Forum that MSDC have a poor record of housing provision, with previous poor completion rates, at an average of only 518 dpa over the last 12 years. Therefore the buffer applied to the five year supply of the District should be 20%. Low completion rates have been a consequence of MSDC failing to maintain an up-to-date local plan for a large part of this period and subsequently schemes, which were clearly appropriate including some allocated in Neighbourhood Plans were refused planning permission. A large number of which were subsequently granted on appeal.

10.8. The District has consistently failed to meet housing delivery targets. The housing market has been strengthening since circa 2011/12 (as set out in **Appendix 3**) and in that time the level of housing provision has remained below the housing target in all but one year. In this time there has been no up to date plan, and a significant number of planning appeals.

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

10.9. Based on a housing requirement of at least 1,000 dpa housing requirement the present 5 year housing land supply (at 1st April 2016) is **3.33 years** (see **Table 10.1**)

Table 10.1 – Savills Five Year Land Supply Analysis for the Forum

Requirement	MSDC (800 dpa)	MSDC (1,000 dpa)	Forum	
District Plan housing requirement 2016 - 2021	4,102	5,502	5,502	Based on the plan requirement to achieve 1000dpa (x5) +502 shortfall from the first 2 years of the plan (1,498 dwellings were delivered against a requirement for 2,000 (1000x2)).
Annualised housing requirement with 20% buffer applied (years 1 -5 only)	4,922	6,602	6,602	5,502 x 20% (1,100)
Supply				
Commitments				
Large sites with Planning Permission	3433	3433	3073	Sewerage treatment works not deliverable hence 375 deducted from trajectory, 150 of which from 5 year supply Land west of Copthorne Way 90 units have been included in the 5 year supply not 300 units a reduction of 210 units
Large allocated sites without planning permission	55	55	0	Rookery Farm, Rocky Lane considered undeliverable in the first five years
NP sites without PP	160	160	60	Reduction of 20 units due to Land North of Faulkners Way, Burgess Hill being included in Northern Arc and reduction in 80 units as Land at Victoria Road Burgess Hill is already in list of large sites with PP
Sites identified in the SHLAA	239	239	239	
Small sites with planning permission (with 40% discount applied)	317	317	317	
District Plan allocation at Burgess Hill	515	515	255*	
District Plan allocation at Pease Pottage	150	150	450**	Planning application pending decision
Total Housing Supply in year 1 - 5	4,869	4,869	3,955***	
Five year supply	4.94	3.68	3.33	Total supply /Total requirement x 5
Deficit over the 5 year period	-53	-1,733	-2,208	

*Provided by Gleeson, Rydon and Wates (Northern Arc Promoters). Please note this figure is only included on a without prejudice basis and is not agreed by all parties.

**Figures provided by Thakeham (Pease Pottage Promoter). Please note this figure is only included on a without prejudice basis and is not agreed by all parties.

***3,955 represents the total supply (4,394 units) minus a 10% non-implementation rate

Please note: Individual members of the Forum reserve the right to make their own representation on the delivery trajectory of individual allocated sites

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

10.10. Table 10.1 shows that at present and on adoption of the District Plan in its current form the District are unable to demonstrate a five year housing land supply. On the basis of the Forum housing trajectory (**Appendix 5**) there is clearly a need for additional residential allocations, of varied scale in order to promote choice and competition for land, and ensure a significant boost in the supply of housing. In order to ensure that additional sites come forward within the five and ten year periods, the Council must allocate additional sites now as part of the District Plan.

10.11. In addition, few new sites and an insufficient number of new sites have been allocated via Neighbourhood Plans (see **Appendix 4**).

11. Conclusions

What parts of the Mid-Sussex District Plan (November 2015) are unsound? Which tests of soundness does it fail and why? How can (if at all) the MSDP be amended to ensure soundness?

11.1. In light of the comments made in this statement, the Forum respectfully ask the Inspector to consider the following potential courses of action:

- Review and amend the Objectively Assessed Housing Need (OAN).
- Consequently amend the overall housing requirement.
- Seek additional site allocations now, to significantly boost the supply of housing.

11.2. The Forum is committed to supporting this process in order to ensure a sound plan and will provide assistance as necessary to the Inspector and the Council to identify the evidence required for the appropriate changes. **Appendix 6** includes the terms of reference for the Forum.

OAN / Housing Requirement

11.3. The Plan is unsound with respect of the planned level of housing and OAN. This is ineffective, unjustified and not positively prepared.

11.4. Despite evidence of worsening affordability, unmet housing needs, and the clear NPPF requirement for a 'significant boost' in the supply of housing, the current Mid-Sussex Local Plan (2016) proposes 13,600 dwellings between 2014-2031 (800 dpa). Despite previous plans including higher levels of planned housing growth and in the context of contemporary evidence indicating worsening affordability and unmet housing needs the Council have still included a low housing target based on a flawed OAN.

Allocation of Additional Sites

11.5. The Council's justification for not allocating additional sites is flawed and in the context of the Forum's position on OAN this is a fundamental issue with the Plan. There appears to be no good reason to not undertake a re-assessment of all available sites and consider the inclusion of additional allocations in the District Plan rather than waiting unnecessarily for a Site Allocations DPD. This will allow for the District to provide the level of housing required to meet the needs of the community and enable them to maintain a five year housing land supply.

Delivery

- 11.6. The suggestion is **MSDC1** that the insufficient housing requirements “*has been a failure of developers to commence and then complete development*” is unsubstantiated and is not constructive in investigating ways in which delivery can be increased when in fact the lack of an up to date Local Plan and over constraint of development by Neighbourhood Plans has contributed heavily to the under delivery. This is evidenced for example by the number of non allocated sites granted planning permission at appeal. There appears to be no market reasons why delivery of housing cannot be increased in line with delivery rates experienced in neighbouring authorities. Delivery would be further increase by the allocation of additional sites within the District Plan.

Consultation on Further Proposed Modifications

- 11.7. The Further Focused modifications have introduced an increased Objectively Assessed Housing Need (from 656 dpa to 714 dpa) and a reduction in the Council’s contribution to Crawley’s unmet need (from 105 dpa to 46 dpa), in addition to a number of other changes. Whilst these amendments are reflective of changes since the November 2015 consultation, there does not appear to be any evidence within the examination library that indicates that the scope of these modifications have been agreed with interested parties or stakeholders. Furthermore, these changes have not been consulted upon nor agreed with the wider development industry or local communities in general. The Forum notes in **ID1** the Inspector’s initial determination that further consultation is required.
- 11.8. There is no evidence that **BP17** – Duty to Cooperate Statement (August 2016) has taken into account the further modifications to the Plan. Paragraph 3.5 refers to various dates of correspondence with Crawley Borough Council; however, the lack of appendix 7 & 8 in the statement (as referred to in the text) makes it unclear as to what these discussions were and what the subsequent changes were based upon. These documents should be made available by MSDC.
- 11.9. The **BP5** Sustainability Appraisal (August 2016) makes it clear that it is based on assertions made as part of the **BP1** Further Modifications to the Pre-Submission Draft and Focused Amendments (August 2016). It is clear that the Further Modifications should have been consulted upon, as they have been used to form the basis of the Sustainability Appraisal (August 2016).

11.10. Further modifications have also resulted in amendments to the Council's housing numbers and therefore the housing case made within the District Plan. **It is the view of the Forum that leaving these amendments to submissions within Examination Statements is not in the interests of proper plan-making and as such the Council should consult on these changes now or as clear Main Modifications during the examination process.**



Appendices

Appendix 1

List of Developers Forum Members Land Interests

Mid Sussex Developers Forum – SITE INTERESTS
7th November 2016

Company	Site Interest (Name and Location)	Greenfield/ Brownfield	Site Area	Estimated Dwelling Capacity
Barratt Homes Barratt Homes Southern Counties Barratt House Walnut Tree Close Guildford Surrey GU1 4SW	Chalkers Lane, Hurstpierpoint (under construction)	Greenfield	3.77ha (9.3 acres)	61 units
	Heathwood Park (Phase 2), Langmore lane, Lindfield (under construction – JV with Wates)	Greenfield	13.9ha (34.3 acres)	230 units
	Land at Mackie Avenue, Hassocks (Freehold)	Greenfield	6.64ha (16.4 acres)	140 units
Countryside St Johns House Suffolk Way Sevenoaks Kent TN13 1YL	Bolney Road, Ansty	Greenfield	2.2ha (5.4 acres)	50 units
Welbeck Land 13 Woodstock Street London W1C 2AG	Land West of Imberhorne Lane, Imberhorne Lane East Grinstead	Greenfield	51ha (126 acres)	550 units
Gleeson Sentinel House Harvest Crescent Ancells Business Park Fleet Hants	London Road, Hassocks	Greenfield	5.3ha (13.1 acres)	97 units
	Burgess Hill West Site (part of the Northern Arc) (Jointly controlled with Rydon Homes)	Greenfield	98 ha (242.2 acres)	1,360 units
	Land at Hazel Close, Crawley Down	Greenfield	2.71ha (6.7 acres)	60 units
	Land north of Hassocks	Greenfield	20ha (49.4 acres)	140 units
	Lindfield	Greenfield	5.7ha (14.1 acres)	100 units

Hallam Land 108 New Bond Street London W1S 1EF	Land at Horsham Road, Handcross	Greenfield	6.63ha (16.38 acres)	100 units
	Retained land at Handcross	Greenfield	0.34ha (0.85 acres)	15 units
	Existing Parish Hall site, Handcross	Brownfield	0.41ha (1.01 acres)	
Linden Homes 1A Guildford Business Park, Guildford Surrey GU2 8XG	Hill Place Farm, East Grinstead	Greenfield	~8.7ha (21.5 acres)	200 units
Redrow Prince Regent House Quayside, Chatham Kent ME4 4QZ	Penlands Farm, Balcombe Road, Haywards Heath (Outline consent granted at appeal)	Greenfield	21.7ha (53.6 acres)	210 units
Reside Developments Ltd The Dutch House 132 – 134 High Street Dorking, Surrey RH4 1BG	Land east of High Beech Lane, Lindfield	Greenfield	2.27ha (5.6 acres)	50 units
	Other in Mid Sussex	Greenfield	6.0ha (15 acres)	150 units
Rydon Homes Limited, Rydon House Station Road, Forest Row, East Sussex, RH18 5DW	Freeks Farm, Northern Arc, Burgess Hill.	Greenfield	19ha (47 acres)	450 units
	Bridge Farm, Northern Arc, Burgess Hill.	Greenfield	3.2ha (7.9 acres))
	Collins South, Northern Arc, Burgess Hill.	Greenfield	14ha (34.6 acres)) 1,118 units
	Paynes Place Farm, Northern Arc, Burgess Hill.	Greenfield	22.59ha (55.8 acres))
	Lowlands Farm, Northern Arc, Burgess Hill	Greenfield	14.88ha (36.8 acres)	100 – 150 units
	Land r/o Friars Oak, Hassocks	Greenfield	10.51ha (26 acres)	130 units

Taylor Wimpey 103 Tonbridge Road Hildenborough Tonbridge Kent TN11 9HL	Land to the east of Gravelye Lane, Lindfield	Greenfield	6.64ha (16.4 acres)	130 units
Thakeham Homes Summers Place Stane Street Billingshurst West Sussex RH14 9GN	Pease Pottage (option)	Greenfield	59ha (145.8 acres)	600 units
	East Grinstead (option)	Greenfield	48.5ha	300 units
	Burgess Hill, Western Arc (Promotion agreement)	Greenfield	75ha (185.3 acres)	1500 units
	Hurstpierpoint (a) (option)	Greenfield	4ha (9.9 acres)	80 units
	Hurstpierpoint (b) (freehold)	Greenfield	8ha (19.8 acres)	90 units
Village Developments East Wing Harewood House Outwood Lane Outwood Surrey RH1 5PN	Hurst Farm , Crawley Down	Brownfield Part	3.34ha (8.3 acres)	75 units
	Florin Farm , Crawley Down	Brownfield / part	5ha (12.4 acres)	55 units
	Landfall House, Crawley down	Greenfield	4ha (9.9 acres)	15 units
	Keepers Knight, Copthorne	Greenfield	9ha (22.2 acres)	200 units
	Pakyns Farm/Pakyns Cottage	Brownfield	2ha (4.9 acres)	45 units
	Foxhole Farm and buildings	Greenfield	2ha (4.9 acres)	40 units
	Foxhole Farm Phase 1 with school (SHLAA site for 180)	Greenfield	7ha (17.2 acres)	145 units
	Foxhole Farm phase 2 (balance of land)	Greenfield	12ha (29.7 acres)	360 units

Wates Developments Ltd Wates House Station Approach Leatherhead Surrey KT22 7SW	Heaselands, Northern Arc, Burgess Hill - Land Promotion Agreement.	Greenfield	57.38 ha (141.79 acres)	1,110 units
	Lindfield, Land South of Scamps Hill Road – Land Promotion Agreement.	Greenfield	24.66 ha (60.93 acres)	200 units
	Crawley Down, Turners Hill Road – Freehold.	Greenfield	1.09 ha (2.70 acres)	10 units
	Crawley Down, Turners Hill Road – Option Agreement.	Greenfield	3.28 ha (8.10 acres)	34 units
	Crawley Down, Turners Hill Road – Option Agreement.	Greenfield.	36.42 ha (90.0 acres)	150 units
	Felbridge, Crawley Down Road – Option Agreement	Greenfield	2.59 ha (6.40 acres)	60 units
			Sub total units	10,575
			Minus district plan allocations	-3,600
			Total	6,975

Appendix 2

Technical note – Housing Needs

(Barton Willmore and NLP, October 2016)

Mid Sussex Objectively Assessed Housing Need

Position Statement of Mid Sussex Developers Forum

October 2016



Nathaniel Lichfield
& Partners
Planning. Design. Economics.

**BARTON
WILLMORE**

1 Introduction

- 1.1 This position statement has been prepared by Nathaniel Lichfield & Partners (NLP) and Barton Willmore on behalf of the Mid Sussex Developer's Forum. It presents a consolidated position statement on Objectively Assessed Housing Need (OAN) to assist the Inspector's understanding, in headline terms, of the main criticisms the development industry has in respect of the Council's evidence on OAN, and the basis of the alternative assessments that have been provided on behalf of the development industry.
- 1.2 Both NLP and Barton Willmore have produced separate and stand-alone technical reports on OAN for their individual respective clients. The NLP report is contained within the appendices to Wates Developments' (respondent reference # 14681) hearing statement. The Barton Willmore report is contained within the appendices to Welbeck Strategic Lands' (respondent reference # 20534) hearing statement.
- 1.3 This position statement provides an overarching summary of the two reports to support the Mid Sussex Developer's Forum common response to the Inspector's questions. It considers the common points of criticism of the Council's HEDNA evidence and provides a precis of the two alternative OAN assessments produced by NLP and Barton Willmore, that, although each drawing on slightly different analysis, assumptions and modelling, both arrive at comparable conclusion on the overall OAN. This statement does not present any detailed analysis itself, which is necessarily contained within the respective reports and can be reviewed therein should a deeper degree of understanding be necessary, but does present a simple and shared position in respect of the overarching issues.

2 A Review of the Mid Sussex HEDNA

- 2.1 The HEDNA Addendum (EP22, August 2016) provides most of the basis for the Council's current OAN assessment of 754 dpa. However, this (nor the Council's previous November 2015 HEDNA, EP21) does not present a suitable, robust or PPG compliant assessment of need. This is because:
- a) The HEDNAs (both EP21 and EP22) give no account to demographic factors which show population growth in Mid Sussex is likely to be higher than the official projections primarily due to the migratory relationship with London. This will likely increase population growth and therefore housing need in Mid Sussex over the plan period;
 - b) The Council has conflated the adjustments to household formation rates (in responding to falls in household formation amongst younger adults - 20-34 age groups - in recent years) with an adjustment for market signals (which should be a supply-side response to worsening affordability) contrary to the PPG which indicates these are separate parts of the OAN calculation (household growth in ID 2a-015 and market signals in ID 2a-020). The Council's level of uplift equates to 24 dpa (or 3%) on the starting point of 730 dpa, which neither reflects the PPG guidance (ID 2a-020) nor provides an adequate response to market signals pressures which could reasonably be expected to improve affordability. It also does nothing to address affordability for those outside of that narrow 20-34 age band;
 - c) The Council has sought to down-play the job growth potential of the District, despite its most recent studies reporting job growth forecasts to be between 478 and 521 total jobs per annum (see para 7.8 and 7.11 of EP21). Rather, the Council has concluded based on employment allocations (i.e. a land supply-led scenario, contrary to PPG ID 2a-004) that in the Plan period that 5,000 jobs will be created, equivalent to 294 jobs per annum (see para 7.16 of EP21¹), and as such no adjustment to the housing number is needed. However it is important to note that the lower figure of this job growth range (478) is incorrect. The Burgess Hill Employment Sites Study incorrectly states the number of jobs in 2030 as 73,029 (see Table 3.11, page 57, EP36). It has been confirmed with the source (Experian Economics) that the correct figure is 76,120 (see Annex 1). This adjusts the range from 478-521 to 521-644 total jobs per annum.
 - d) The Council's affordable housing needs assessment uses net household formation (rather than gross, as required in the PPG ID 2a-025) which introduces double counting (with re-lets from household dissolution), thereby underestimating the level of need (see Tables 17 and 18 of EP21, which use the household projection for calculating need, which is a net figure). The assessment also includes 1,223 units of committed supply of affordable housing (Tables 17 and 18 of EP21), which should not be used to offset the initial calculation of overall need as this stock is yet to be delivered, i.e. it is still 'needed'. These same approaches appear to have been also adopted in the HEDNA Addendum

¹ Assumed to be a total jobs per annum figure, rather than a Full Time Equivalent (FTE) figure. If it is not, MSDC are not comparing like-for-like figures. Total jobs is the relevant figure for the purposes of the modelling.

(see para 1.47 of EP22), albeit the whole calculation has not been set out, meaning the same criticisms apply to the conclusions of both the HEDNA Update and Addendum. These two elements result in the Council's assessments of affordable housing need being significantly lower than they should be. The Council uses its underestimated calculation to justify its conclusion that the OAN would (according to the Council's calculation) meet most/all affordable housing needs (see para 1.53 of EP22). However, correcting the calculation for these two elements shows affordable housing need - in line with the PPG (ID 2a-029) - would trigger the need to consider an uplift to the OAN.

The Housing Market Area

- 2.2 Mid Sussex is identified as being primarily within the Northern West Sussex HMA , however, there are strong links with the Coastal West Sussex HMA including Brighton and Lewes which neighbour Mid Sussex (e.g. see EP24 para 2.60 and EP20 para 2.77 and 2.78). The Council has acknowledged the level of unmet need that exists across the wider sub-region estimating this to total c. 37,000 dwellings, which includes c.185 dpa from Crawley which is within Mid Sussex's primary HMA (see EP14 and MSDC1 page 12). However, despite the increase in the Council's OAN (from 696 dpa to 754dpa) no change has been made to the overall requirement (which remains at 800 dpa), meaning the level of unmet need the District is meeting has decreased from 105 dpa to just 46 dpa. This would meet only one quarter of the unmet need from Crawley, let alone any of the further needs from elsewhere such as Brighton. Paragraph 47 of the NPPF requires Local Planning Authorities to identify and seek to meet full objectively assessed needs in the relevant housing market areas. The Council's evidence demonstrates that there remains significant unmet housing needs in the HMA.

3 Summary of NLP OAN

- 3.1 **The Starting Point** – the starting point is based on the most recent population and a household projection published by ONS/DCLG (in this instance, the 2014-based projections), and is the same as that used by the Council (see para 1.37 EP22). Over the plan period 2014-31, taking into account an appropriate vacancy rate for second homes/vacant dwellings, this equates to a need for 730 dpa (see NLP Report para 3.5).
- 3.2 **Demographic-led Need** – the latest projections should be seen in the context of local market circumstances and other demographic factors which may mean that an adjustment (either to the underlying population projection or household formation rates) is required (as per PPG ID 2a-015, 2a-017. In the case of Mid Sussex, it is necessary to make two adjustments;
- i An adjustment to the underlying population growth to account for projected increases in migration from London; and
 - ii Adjustments to the household projections (in terms of formation rates) to address the fall in household formation amongst young adults seen throughout the 2001-11 period and through the recession (as per PPG ID 2a-015).
- 3.3 Taking account of these two factors would indicate the demographic-led need for Mid Sussex (i.e. the starting point plus these adjustments) of **784-833 dpa** (see NLP Report para 3.13-14). This is presented as a range given the Greater London Authority (GLA) has produced two alternative population projections for London. This provides the demographic-led needs for the District upon which any further uplift is considered.
- 3.4 **Market Signals** – the PPG is clear that worsening trends across any market signals indicator would justify uplift (ID 2a-020); that the scale of uplift should be set at a level which could reasonably be expected to improve affordability (ID 2a-020); and that the more significant the affordability constraints, the larger the response should be (ID 2a-020). Average house prices in Mid Sussex are £325,000 (significantly above the West Sussex and England average)². Entry level house prices are 12.6 times earnings (again, significantly above the national average) and this ratio has risen consistently since 2009³. Average monthly rents are £925 and have been rising faster than the national average since 2011⁴. Between 2001 and 2011 the rate of overcrowding and concealment, whilst lower than the national average, rose faster in Mid Sussex than nationally⁵. In addition, Mid Sussex has failed to deliver sufficient housing to meet planned supply on the 'rate of development' market signal⁶.
- 3.5 The indicators strongly support an uplift for market signals. In terms of calculating an appropriate uplift, previous Local Plan Inspector's findings give an indication as to what an appropriate uplift might be; the Inspector in Eastleigh advocated an uplift of 10% for 'modest' market signals⁷ and the Inspector at in Canterbury accepted an uplift of 20% for 'more than modest' market signals⁸. Comparing some of the key headline indicators

² Source: ONS House Price Statistics (published June 2016)

³ Source: DCLG Live Table 576: Ratio of House Prices to Earnings (Lower Quartile and Median)

⁴ Source: Value Office Agency Private Rental Market Statistics (published June 2016)

⁵ Source: Census 2001 and 2011

⁶ Source: Mid Sussex Housing Annual Monitoring Reports

⁷ Eastleigh Borough Local Plan Inspectors Report February 2015

⁸ Canterbury Local Plan Inspectors Interim Findings August 2015

in these areas (prices, rents and affordability) shows that Mid Sussex performs worse across the majority of these indicators than both Eastleigh and Canterbury. In our judgement a 25% uplift on demographic-led needs would be appropriate and necessary for Mid Sussex, providing an adequate response to the severe extent of market signal and affordability pressures identified in the District. Applying a 25% uplift to the demographic-led needs of 784-833 dpa would result in a need **for 980 to 1,041 dpa**.

- 3.6 **Economic Alignment** – Three jobs-led scenarios have been assessed to determine whether employment needs indicate any further adjustment should be made to the OAN for the plan period. These scenarios are based on the Economic Growth Assessment (EGA) (521 jobs pa 2011-31 as per EP 21 para 7.8) equivalent to 507 jobs pa 2014-31), the Burgess Hill Employment Sites Study (478 jobs pa 2011-31 as indicated in the report and stated in EP21 para 7.11, though NLP note Barton Willmore’s further evidence that this is incorrect) and the Council’s estimate of the number of jobs which will be created throughout the plan period (294 jobs pa 2014-31, as stated in EP21 para 7.16).
- 3.7 These scenarios result in a level of housing need (also taking account of the adjustments to household formation rates) of between 679 dwellings per annum (based on the Council’s job estimate) and 853 dwellings per annum (based on the EGA forecast) (see NLP Report para 3.59-65). The outcomes of these scenarios suggest that the level of population and labour force growth generated through the demographic-led scenarios (including growth associated with London, and a market signals uplift) would produce a sufficient labour force to support the EGA job growth forecast, and as such no further uplift (above 980-1,041) is applied, although higher job growth potential would further support the range indicated.
- 3.8 **Affordable Housing Need** – NLP has not sought to carry out its own assessment of affordable housing need, instead drawing upon evidence in the Council’s HEDNA and correcting some elements of the calculation (as identified in point 4 of the critique of the Council’s work above).
- 3.9 Updating the calculation (based on reasonable preference groups only) shows, there is a net need for **380 affordable dwellings per annum** (see NLP Report Table 3.13). Whilst the emerging Plan was seeking to provide 40% affordable housing (BP1), the Council has since stated (MSDC1, page 2) that the affordable housing requirement will revert to 30% (as per BP2) due to uncertainty around emerging starter homes policy. Historically, the Council has delivered an average of 26% of homes as affordable (see NLP Report Figure 3.7). Were this rate of delivery to continue a total of 1,462 dwellings per annum would be needed. If delivery increased to 30% as per the emerging plan, a total of 1,267 dwellings per annum would be needed. This indicates a need to uplift the OAN, further supporting the market signals uplift identified.
- 3.10 **Concluded OAN** – Taking into account the starting point, demographic-led needs and a market signals uplift, there is a need for 980 to 1,041 dwellings per annum. Employment growth estimates supports the higher demographic-led needs identified and indicate the need for uplift above the ‘starting point’. Although no further uplift for employment is needed on the figure identified for market signals, it does support the scale of uplift . The level of need to meet affordable housing need is dependent on how

much housing is delivered as affordable and is likely to be in excess of 1,267 dpa. Therefore, taking the demographic-led needs, market signals, employment alignment and affordable housing need together **it is considered that full objectively assessed needs for Mid Sussex is at least 1,000 dpa 2014-31, excluding unmet needs from elsewhere.**

- 3.11 **Unmet Needs** – A review of adopted Plans and SHMA evidence across Sussex illustrates the level of unmet need that exists (see NLP Report Tables 4.2, 4.3, 4.4). From within the Northern West Sussex HMA there is currently 185 dpa from Crawley unaccounted for (see NLP Report Table 4.2). Within the Coastal West Sussex HMA, with which Mid Sussex is linked, there is a further 1,496 dpa of unmet need (which includes a significant amount of need - 846dpa - from contiguous areas of Brighton and Hove and 145dpa from Lewes, see NLP Report Table 4.3). Elsewhere in Sussex (Wealden [which borders Mid Sussex], Eastbourne, Hastings and Rother) there is a further 778 dpa of unmet need (see NLP Report Table 4.4).

4 Summary of Barton Willmore OAN

- 4.1 **Introduction:** Barton Willmore's assessment shows how an unconstrained OAN for MSDC results in need of at least 1,000 dpa 2014-2031. This level of OAN is reached through each of the following PPG compliant steps:
- Market Signals uplift (961-1,011 dpa);
 - Economic-led uplift (918-1,101 dpa);
 - To meet affordable housing need in full (1,267-1,580 dpa).
- 4.2 Each of these steps are summarised in turn below.
- 4.2 **The Starting Point** – the starting point is based on the most recent population and household projections published by ONS/DCLG (in this instance, the 2014-based projections), and is the same as that used by the Council. Over the plan period 2014-31, taking into account an appropriate vacancy rate for second homes/vacant dwellings, this equates to a need for **730 dwellings per annum** (see Table 5.1, page 25, BW OAN report).
- 4.3 **Demographic-led need** – Barton Willmore have applied two sensitivity scenarios to address the fall in household formation projected by the 2014-based CLG household projections amongst young adults aged 25-44. The first aligns with the recommendations of the Local Plan Experts Group (LPEG) report (50% return to 2008-based rates), and the second applies a 100% return to 2008-based rates. This results in a demographic-led range of **between 769 and 809 dwellings per annum** (see Table 5.1, page 25, BW OAN report). This does not allow for additional migration from London and should be seen as a prudent range;
- 4.4 **Market Signals** – Barton Willmore's analysis of market signals shows the same data as NLP's in respect of affordability and house prices. In addition, Mid Sussex have consistently under delivered against local Plan targets, a factor which magnifies the acute market signals pressure in the District. In the context of a comparison with other local authorities where an uplift of between 10%⁹ and 30%¹⁰ has been applied to demographic-led need (see paragraphs 5.18-5.26, BW OAN report), Barton Willmore consider that at least 25% is justified in Mid Sussex. Applying a 25% uplift to the demographic-led needs of 769-809 dpa would result in a need for **961 to 1,011 dwellings per annum**.
- 4.5 **Economic-led need** – Barton Willmore have considered a range of job growth between 521 and 644 jobs per annum, 2011-2031. The lower end of this range is sourced from the Economic Growth Assessment (April 2014, EP 35(i) para 7.41). The upper end is drawn from the more recent Burgess Hill Employment Sites Study (BHES, EP36, March 2015) which incorrectly reports job growth of 478 jobs per annum, 2011-2031. This is due to EP36 incorrectly stating the number of jobs in 2030 as 73,029 (see Table 3.11, page 57, EP36). It has been confirmed with the source (Experian Economics) that the correct figure is 76,120 (see Annex 1). This adjusts the range from 478-521 to 521-644 jobs per annum.

⁹ Eastleigh Local Plan Inspector's Examination Report, February 2015

¹⁰ As proposed by Cambridge City Council in their emerging Local Plan, 2016

- 4.6 Barton Willmore's demographic modelling applies two sensitivity scenarios in respect of commuting (1.19 based on 2011 Census; and 1.25 based on Annual Population Survey data), and the two household formation scenarios set out above. Office for Budget Responsibility (OBR) economic activity rate projections have also been applied. This results in a range of **between 918 and 1,101 dwellings per annum** (see Table 5.2, page 27, BW OAN report)
- 4.7 **Affordable Housing Need** – Barton Willmore's analysis of Mid Sussex DC's evidence base suggests that the affordable housing need range is between 371 and 474 affordable dwellings per annum. On the basis of the Council's stated affordable delivery rate of 30% (MSDC1, page 2) it would be necessary to plan for the delivery of **between 1,237 and 1,580 dpa** in order for affordable need to be met in full. Clearly any reduction in this affordable delivery rate would increase the level of housing required.
- 4.8 **OAN Conclusions** – Taking into account the starting point, demographic-led need, market signals uplift, and economic-led need, OAN is considered to range between 961 and 1,101 dwellings per annum. The level of need to meet affordable housing need is dependent on how much housing is delivered as affordable and is likely to be in excess of 1,237 dpa.
- 4.9 **Taking the demographic-led needs, market signals, employment alignment and affordable housing need together it is considered that full objectively assessed needs for Mid Sussex is at least 1,000 dpa 2014-31, excluding unmet needs from elsewhere.**
- 4.10 **Unmet Need** – BW agree with the conclusions of NLP in this regard, as set out above in paragraph 3.11.

5 Conclusions

5.1 The table below presents an amalgamated overview of the various conclusions.

Component		Mid Sussex DC	NLP	Barton Willmore
Household Projections		730 dpa CLG 2014-based household projections + 2.3% vacancy rate (HEDNA Addendum, para. 1.37)	730 dpa CLG 2014-based household projections + 2.3% vacancy rate	730 dpa CLG 2014-based household projections + 2.2% vacancy rate
Demographic-led Needs (following adjustments)	Headship rate/ household formation adjustment?	754 dpa Uplift of 24dpa applied as 'market signals uplift' based on difference between total household growth in 2008-based and 2012-based projections for 20-34 age groups over the plan period 2014-31 (HEDNA Update Table 15). Equivalent to 3.2% market signals uplift.	755 dpa Adjustment to headship rates for 15-34 age groups to return halfway (50%) to 2008-based rates by 2033.	769-809 dpa Adjustment to headship rates for 25-44 age groups to return by 50% and 100% to 2008-based rates by 2033.
	Other demographic adjustments?		784-833 dpa London/GLA consistent migration assumptions (high/low) with part-catch-up headship rates.	
	Demographic-led needs		784-833 dpa Concluded demographic led needs.	769-809 dpa Concluded demographic led needs.
	Market Signals Uplift		980-1,041 dpa 25% market signals uplift on demographic-led needs.	961-1,011 dpa 25% market signals uplift on demographic-led needs.
Economic Alignment		750-800 dpa (294 jobs per annum) HEDNA Update Table 20 and para 7.16. 294 jobs per annum based on planned for B-class employment. HEDNA Addendum Table 9 provides updated figures.	853 dpa (507 jobs per annum) Based on EGA jobs growth scenario (Experian Economic Forecast) for shorter 2014-2031 plan period.	918-1,101 dpa (521-644 jobs per annum) Based on range of job growth reported by the EGA (EP35 (i), April 2014) and <i>corrected</i> forecast reported in the BHESS (EP36, March 2015) report (521-644 jobs per annum); and 50%/100% household formation scenarios.
Affordable Housing Need		127 affordable dwellings per annum (317 total dpa @ 40% delivery) HEDNA Update Table 17/18 - No change to conclusion in HEDNA Addendum.	380 affordable dwellings per annum (1,267 total dpa @ 30% delivery) Re-calculates HEDNA Update Table 17 by replacing net with gross household formation and removing committed supply (i.e. removing double counting).	371-474 affordable dwellings per annum (1,237-1,580 total dpa @ 30% delivery) Re-calculates HEDNA Update Table 17 by replacing net with gross household formation of those aged 15-44 (based on a calculation between 2014 and 2019)
Concluded Full OAN for Mid Sussex District		754 dpa	1,000 dpa Based upon demographic-led needs and triangulation of: +25% for market signals; uplift for economic alignment (at least 853dpa); and going towards meeting affordable needs (1,266dpa)	1,000 dpa

Annex 1 – Barton Willmore correspondence with Experian

Dan Usher

From: Suleman, Mohammed <Mohammed.Suleman@experian.com>
Sent: 17 October 2016 13:43
To: Simon Macklen; Rawson, Jon
Cc: Dan Usher
Subject: RE: Mid Sussex - Experian Regional Planner Forecast December 2014

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Simon,

Looking at our December 2014 database, we can't find those total job numbers for Mid Sussex either (the 73,029 in 2030), but we can see the 76,120 that you mentioned.

We're not exactly sure what numbers the council are quoting in the report.

If you have any further questions on this please feel free to get in touch.

Kind regards,

Mohammed

From: Simon Macklen [mailto:Simon.Macklen@bartonwillmore.co.uk]
Sent: 14 October 2016 17:27
To: Rawson, Jon; Suleman, Mohammed
Cc: Dan Usher
Subject: Mid Sussex - Experian Regional Planner Forecast December 2014

Hi Jon and Mohammed

I hope you might be able to help with a quick query.

We are currently in the process of reviewing some evidence submitted by Mid Sussex District Council to inform its Local Plan, and as part of the Burgess Hill Employment Sites Study the Council has quoted Experian workforce jobs from your December 2014 series. Link below, Tables 3.6 , 3.7 and 3.11

http://www.midsussex.gov.uk/media/3476/bh_sesfinal_2015_web.pdf

Having reviewed the figures I believe that the Council has misquoted your December 2014 forecast. As the extracted Table 3.11 below shows the Council have reported job growth of 73,029 in 2030, I believe Experian December 2014 forecast reported a figure of 76,120.

Would it be possible to check and confirm whether the Council are correct in quoting the figure of 73,029.

Table 3.11: Total Employment Forecasts for Mid Sussex (Experian, December 2014 and Oxford Economics January 2015. Workforce based definition)

Forecast	Total Employment (Workforce-Based)			
	2011	2014	2030*	Change 2014-2030
Experian	63,825	66,542	73,029	6,487
Oxford Economics	63,682	67,966	73,871	5,905
Difference	+143	-1,424	-842	+582

Source: Experian, December 2014, Workforce Basis; Oxford Economics, January 2015

* Oxford Economics forecast to 2030 and Experian to 2031, so 2030-year used for comparison purposes.

Many thanks

Kind Regards

Simon Macklen
Director

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Appendix 3

Mid Sussex Market Capacity – Technical Report

(Savills, October 2016)

Mid Sussex Market Capacity

Technical note

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2. Housing need in the context of past delivery in Mid Sussex	2
3. Recent delivery in Mid Sussex	3
4. Evidence of high delivery in other markets	4
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Executive Summary

In Mid Sussex, housing delivery has averaged 600 per annum over the period from 2012/13 to 2014/15. Analysis of Energy Performance Certificate registrations for new dwellings indicates that this level of delivery has been substantially exceeded over the last 12 months, with annual delivery at approximately 830 in Mid Sussex for the year to March 2016 and 960 for the year to September 2016.

Housing delivery in Mid Sussex is therefore already at the level required to meet the anticipated housing need of c.1,000 additional dwellings per annum. Market capacity has not prevented delivery reaching this level.

Delivery of c.1,000 dwellings per annum in Mid Sussex is equivalent to adding approximately 1.6% to housing stock each year. This or a higher level of housing delivery was achieved across more than ten districts in the south of England in the three years leading up to the 2008 downturn. Most of these districts are either similar or weaker housing markets compared to Mid Sussex.

Cambridge and Aylesbury Vale were the only two districts to have delivered new homes at a rate in excess of 1.5% of stock in 2014/15. Aylesbury is a weaker housing market than Mid Sussex. Cambridge is a stronger housing market, however, with a greater scarcity of supply relative to demand. Following the 2008 downturn Mid Sussex recovered to peak values in April 2014. However, transactions remain below peak. This was a faster recovery than across England, but in line with the South East.

Our analysis shows that housing delivery at the level required to meet need in Mid Sussex has been achieved elsewhere, including in weaker housing markets where the scarcity of new homes supply is less acute. Therefore, market capacity should not be considered a constraint to delivering c.1,000 additional homes per year in Mid Sussex.

1. Introduction

This note addresses the question: “what would be the implications of a higher housing requirement for market deliverability?”

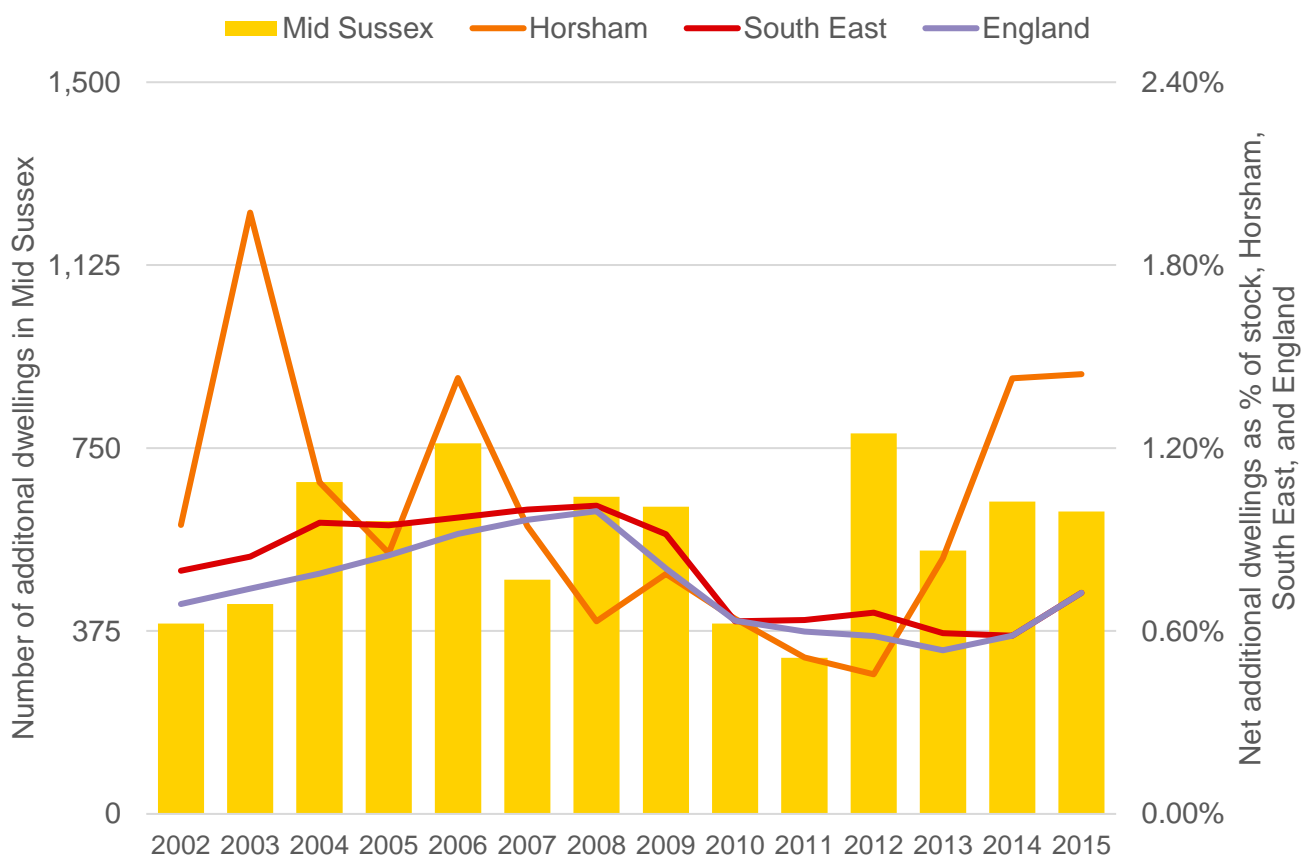
We understand that housing need in Mid Sussex is likely to be c.1,000 additional dwellings per annum. This report places this level of required housing delivery in the context of past delivery in the district. It also provides examples of where this scale of delivery has been achieved elsewhere in the south of England.

2. Housing need in the context of past delivery in Mid Sussex

Housing need in Mid Sussex of 1,000 additional dwellings per annum represents addition of 1.6% to current housing stock (as at 2015). Average housing delivery in Mid Sussex between 2012/13 and 2014/15 has been 1.0% of existing stock. Meeting these higher levels represents a significant increase in delivery.

Unlike many areas across England, Mid Sussex is delivering a similar level of housing now compared to before 2008/09. Whilst delivery in Mid Sussex dipped significantly in 2009/10 and 2010/11, in line with England and the former South East region, it recovered quickly to pre-2008 levels, whereas the wider region and England as a whole are yet to fully recover. Delivery is still below neighbouring Horsham however, which is a similarly active market.

Figure 1 – Net additional dwellings as a proportion of total stock

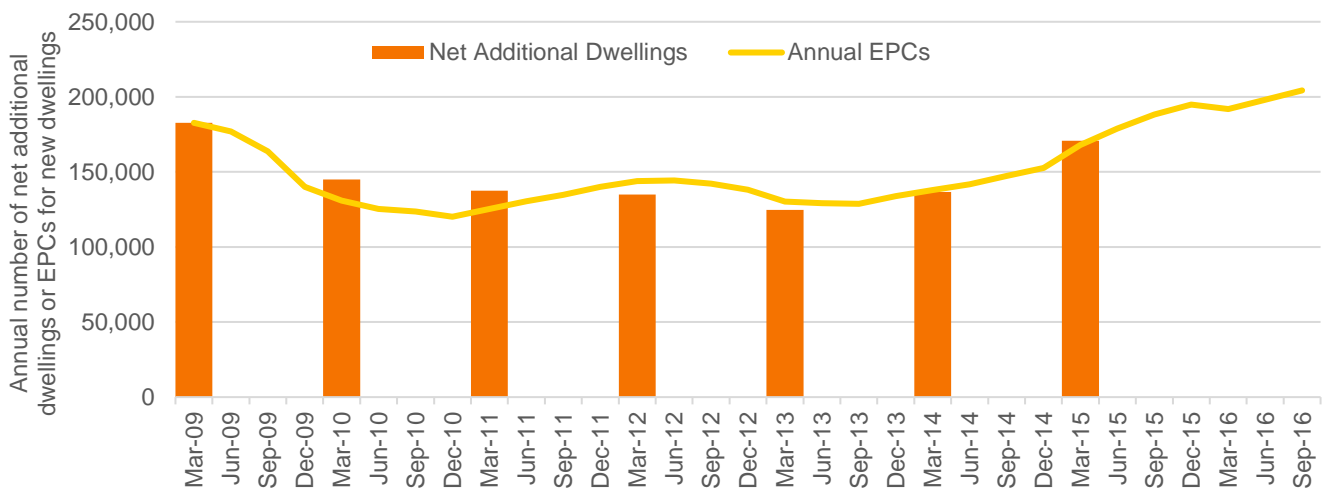


Source: DCLG LT-122, LT-125

3. Recent delivery in Mid Sussex

The official net additional dwellings data compiled by the Department for Communities and Local Government (DCLG) and shown in Figure 1 are only available up to March 2015. Data showing the number of registered Energy Performance Certificates (EPCs) for new dwellings have closely mirrored the DCLG net additional dwellings data since 2008 and are therefore a good forward indicator of net additional dwellings up to September 2016. As shown in Figure 2, this indicates that net additional dwellings will reach nearly 200,000 in England during 2015/16 when the official data comes out at the end of the 2016.

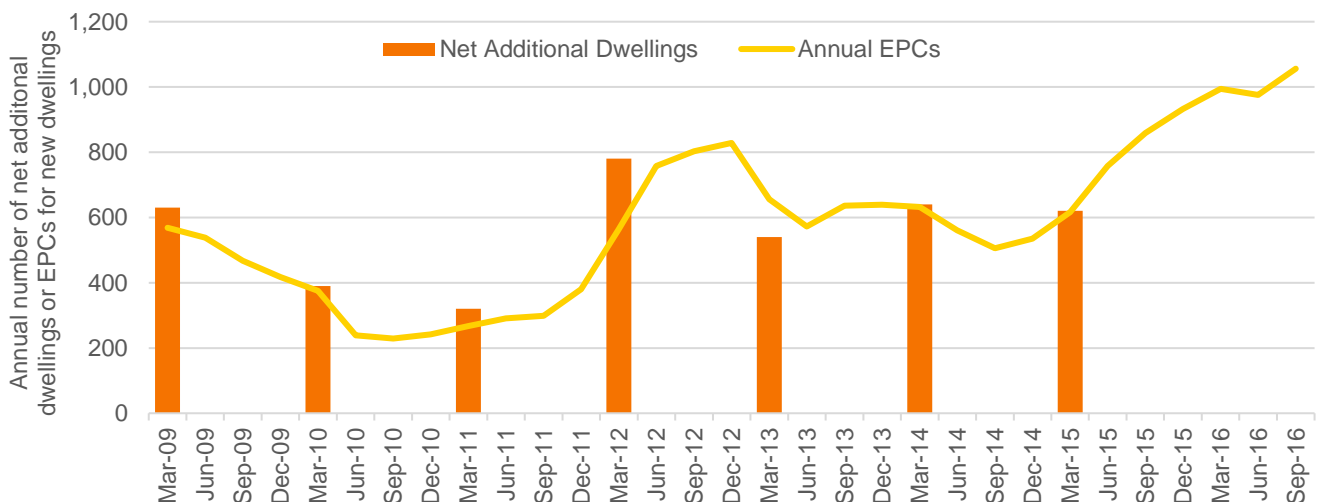
Figure 2 – Net additional dwellings and EPCs for new dwellings in England



Source: DCLG LT-125, DCLG Table NB1

This same method can be applied to Mid Sussex, and indicates annual net additional dwellings is likely to have reached or exceeded 1,000 since December 2015. Market capacity has not prevented housing delivery at a level to meet anticipated housing requirement over the last year.

Figure 3 – Net additional dwellings and EPCs for new dwellings in Mid Sussex

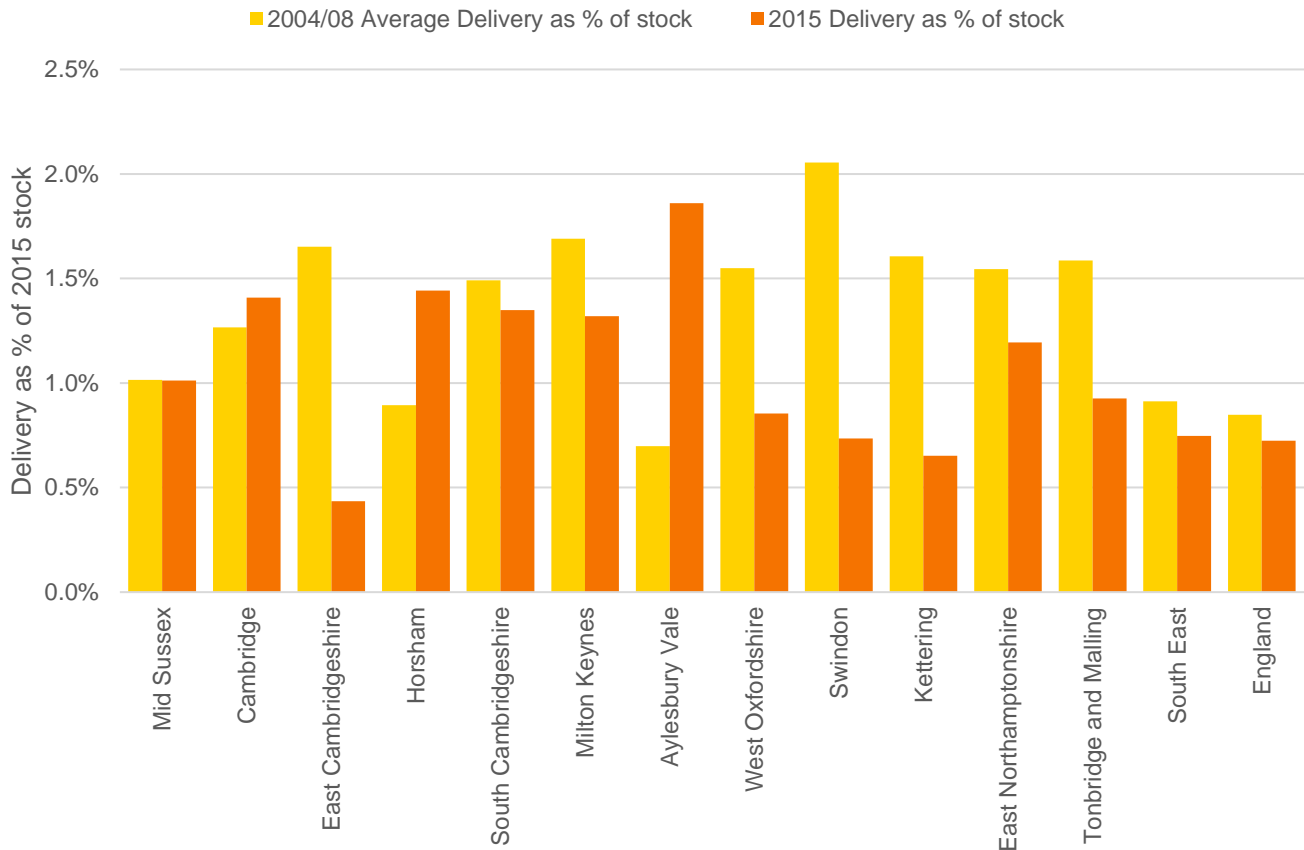


Source: DCLG LT-125, DCLG Table NB1

4. Evidence of high delivery in other markets

This section provides examples of where delivery at the level required to meet housing need in Mid Sussex has been achieved elsewhere. The local authorities in Figure 4 all saw average annual housing delivery of above 1.4% of stock between 2004/05 and 2007/08 (before the downturn) or in 2015. Aylesbury Vale is now delivering close to 2% additions to stock each year.

Figure 4 – Historic levels of housing delivery



Source: Land Registry

Market Capacity in Mid Sussex

Technical Note



The map below shows where these districts are located. Many have similar house prices to Mid Sussex and are located at a similar distance from London. Others are lower value markets which have nonetheless achieved high housing delivery.

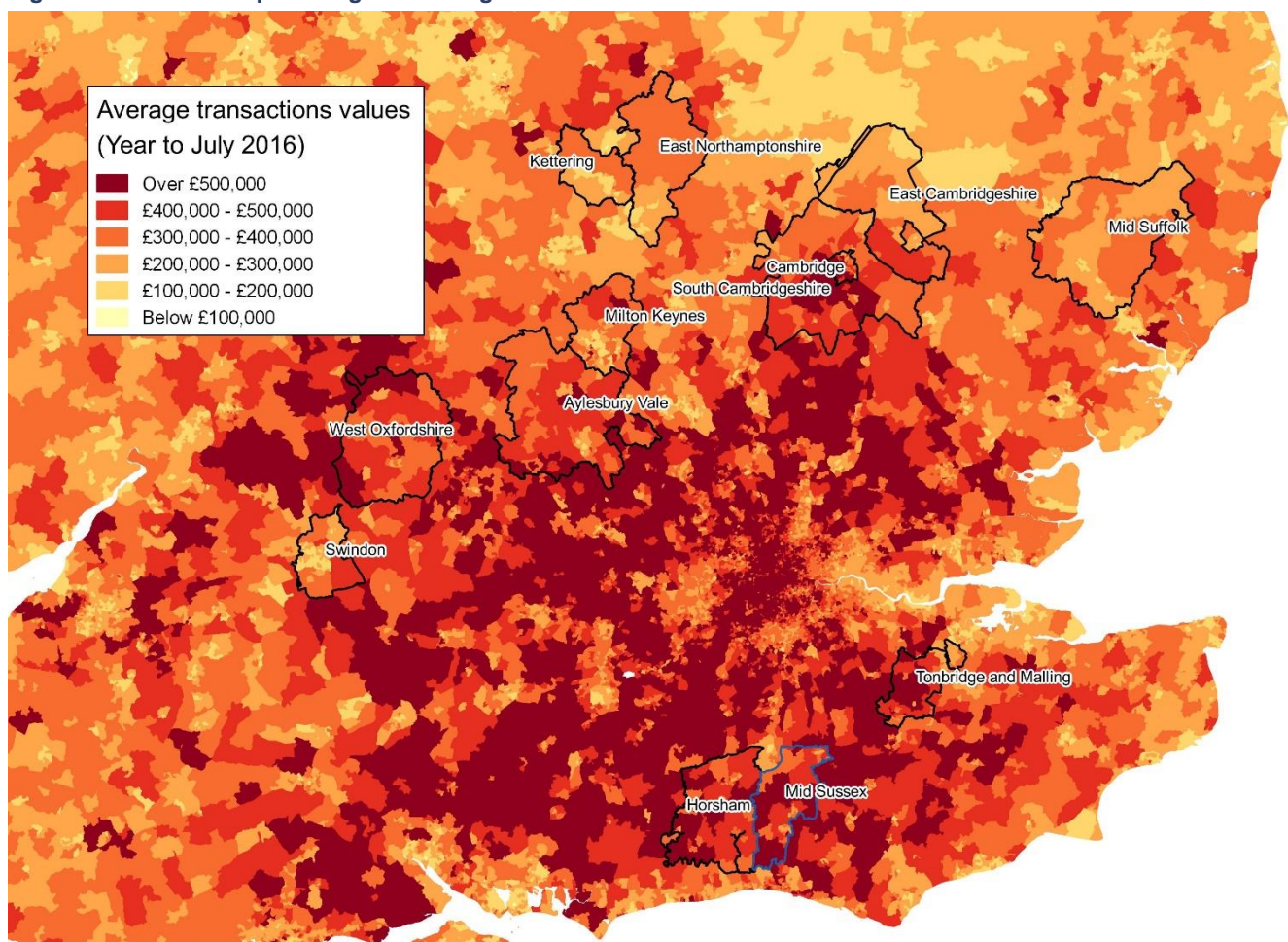
Mid Sussex has some pockets of high value properties, where the average sale prices is over £500,000. The median value in £ per square foot is c.£300.

Table 1 - Average residential values per square foot, 12 months to March 2016

	Median £psf		Upper Quartile £ psf		Upper Decile £ psf	
Mid Sussex	£	300	£	337	£	374

Source: Hometrack

Figure 5 – Values hotspot of high delivering local authorities



Source: Land Registry

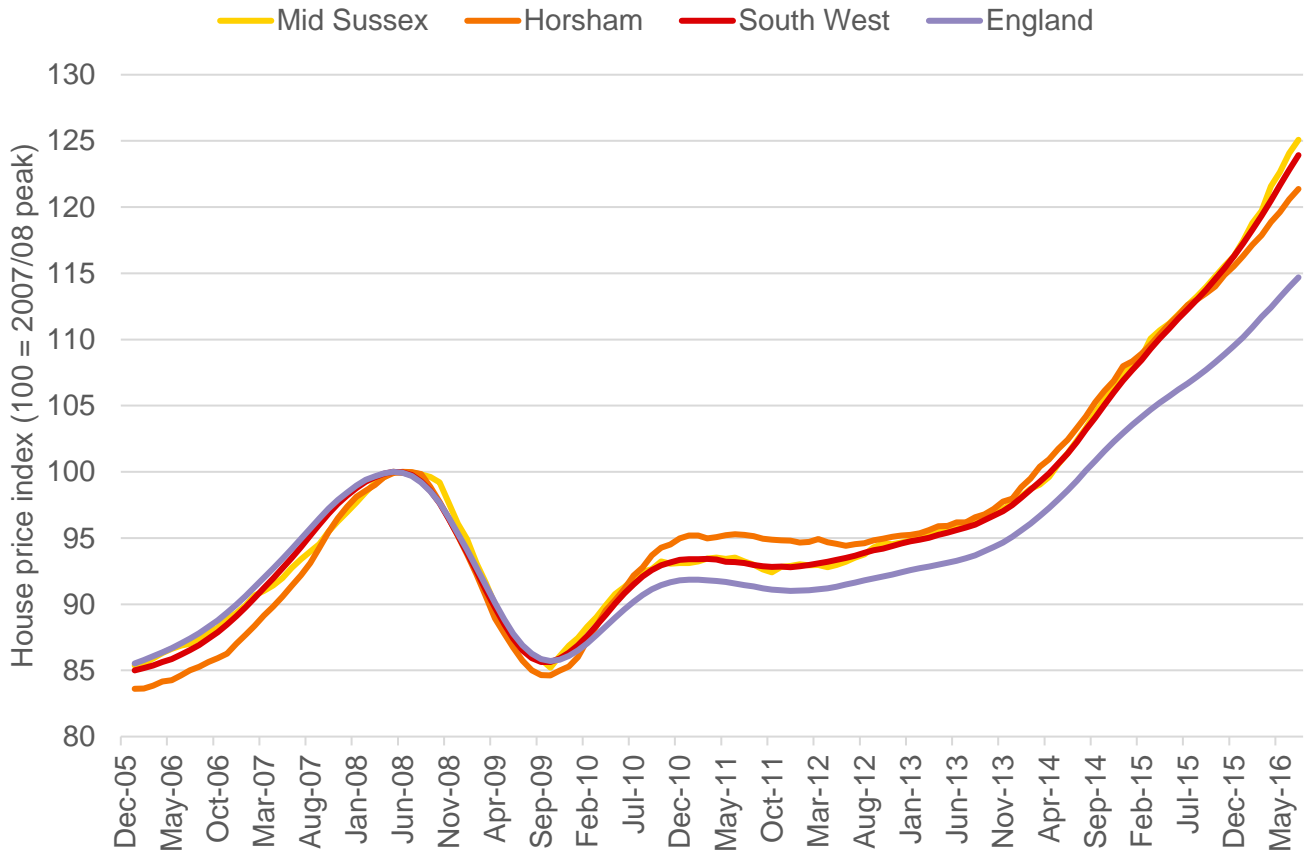
Market Capacity in Mid Sussex

Technical Note



Compared to England as a whole Mid Sussex saw a relatively fast recovery following the 2008 downturn, achieving 2007/08 peak values again by April 2014. Whilst Horsham made a faster recovery to pre-crunch values house price growth has subsequently slowed and Mid Sussex has seen greater house price growth than both Horsham and the wider region.

Figure 6 – House price index



Source: Land Registry

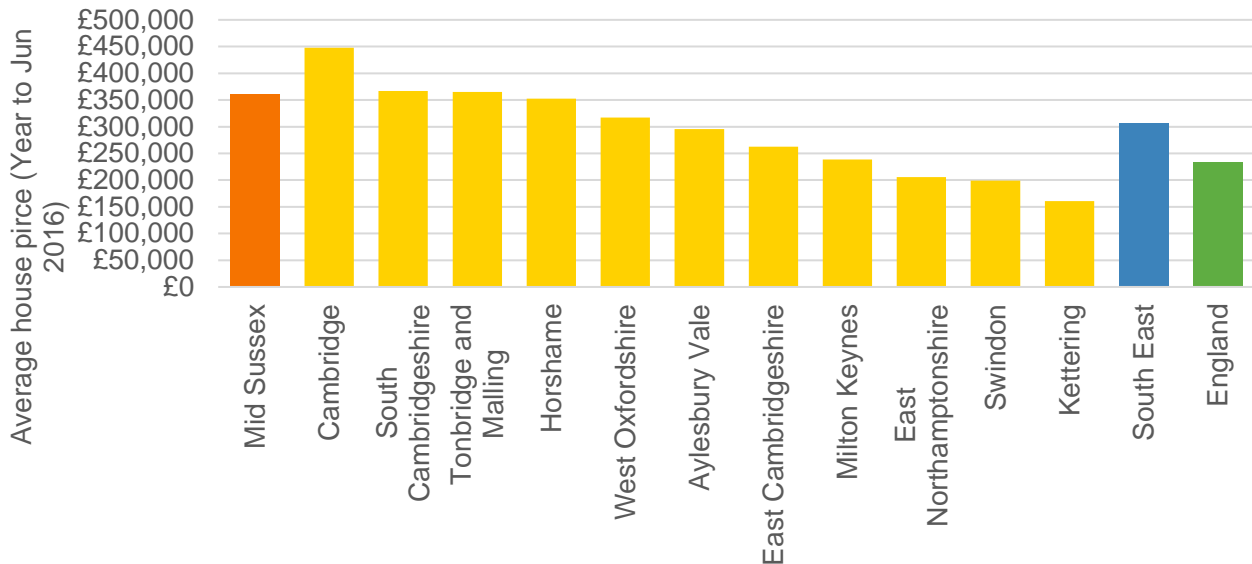
Market Capacity in Mid Sussex

Technical Note



Mid Sussex has higher house prices than the South East average, and is in line with Tonbridge & Malling and South Cambridgeshire. Cambridge has the highest average property value. The other markets in the sample see significantly lower average values, indicating weaker housing markets.

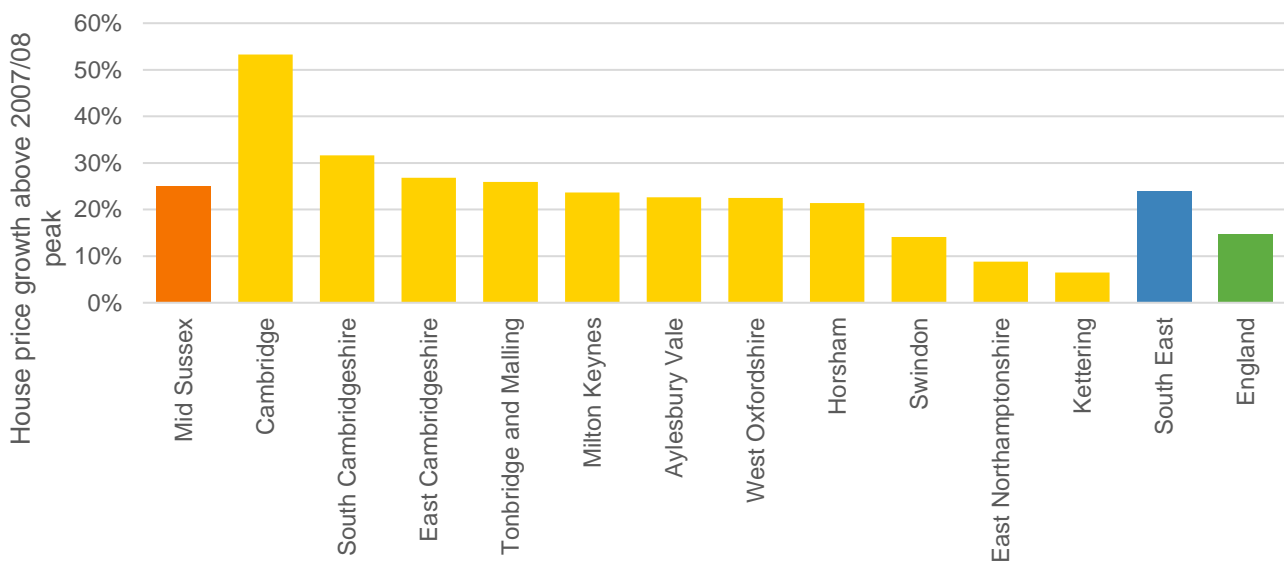
Figure 7 – Average house prices in comparable authorities



Source: Land Registry

House prices have made a strong recovery in Mid Sussex following the 2008 credit-crunch. Values now sit 25% above the pre-crunch peak. Whilst Cambridge has made a much stronger recovery, it is an exception. Mid Sussex is broadly in line with South and East Cambridgeshire, and Tonbridge and Malling, and has recovered much more strongly than Swindon, East Northamptonshire, and Kettering.

Figure 8 – House price growth above pre-crunch peak



Source: Land Registry

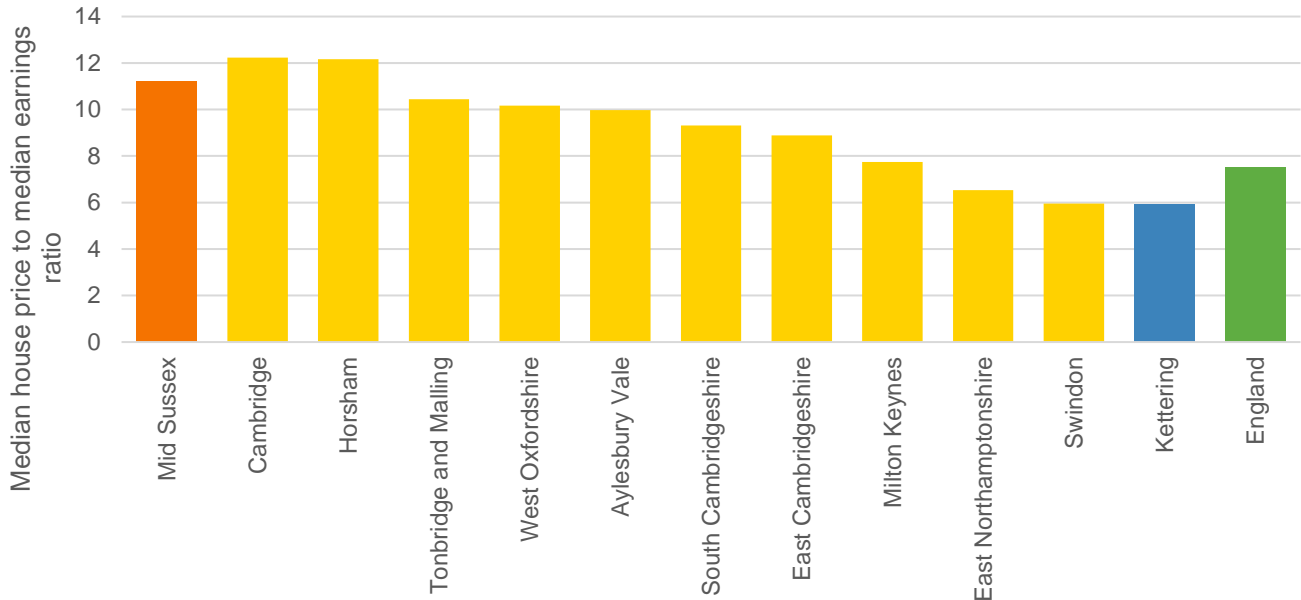
Market Capacity in Mid Sussex

Technical Note



Mid Sussex is one of the least affordable authorities within the sample, with only Cambridge seeing a higher median house price to median earnings ratio. The house price to earnings ratio is almost twice the regional average. This indicates substantial scarcity of housing supply relative to demand.

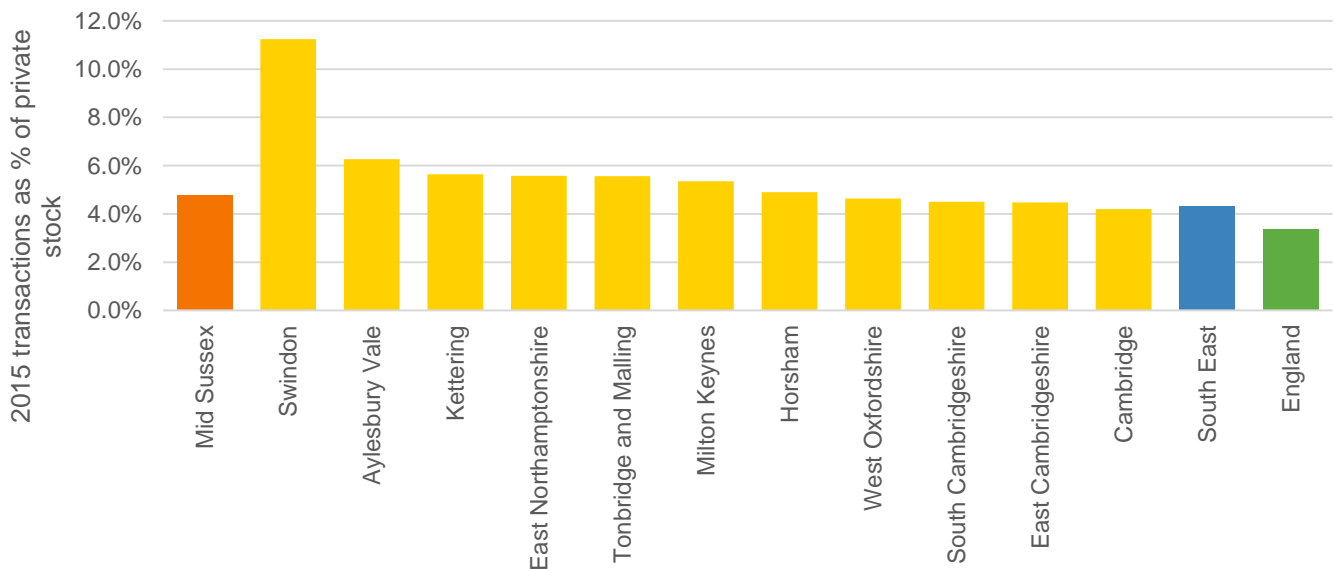
Figure 9 – Median house price to median earnings ratio



Source: DCLG

Like Aylesbury Vale, Kettering and East Northamptonshire, approximately 5.0% of Mid Sussex's private housing stock turned over during 2015. This is above the national and regional average and indicative of a buoyant market.

Figure 10 – Transactions as a proportion of private stock



Source: Land Registry

Market Capacity in Mid Sussex

Technical Note



These four indicators show that Mid Sussex is a stronger market than areas that have previously delivered new homes at or above the rate required to meet housing need. The strong recovery in house prices since the downturn and very high house price to income ratio in Mid Sussex indicate substantial scarcity of supply relative to demand for homes.

Important Note

Finally, in accordance with our normal practice, we would state that this report is for general informative purposes only and does not constitute a formal valuation, appraisal or recommendation. It is only for the use of the persons to whom it is addressed and no responsibility can be accepted to any third party for the whole or any part of its contents. It may not be published, reproduced or quoted in part or in whole, nor may it be used as a basis for any contract, prospectus, agreement or other document without prior consent, which will not be unreasonably withheld.

Our findings are based on the assumptions given. As is customary with market studies, our findings should be regarded as valid for a limited period of time and should be subject to examination at regular intervals.

Whilst every effort has been made to ensure that the data contained in it is correct, no responsibility can be taken for omissions or erroneous data provided by a third party or due to information being unavailable or inaccessible during the research period. The estimates and conclusions contained in this report have been conscientiously prepared in the light of our experience in the property market and information that we were able to collect, but their accuracy is in no way guaranteed.

Appendix 4

Neighbourhood Plans Delivery & Allocation Analysis

(Judith Ashton Associates, October 2016)

JAA assessment of Neighbourhood Plans

Category 1 settlement

Parish	HEDA Nov 2015	NP status and housing numbers allocated	Position in terms of MSDC's commitments
Burgess Hill	2,378	Made 28 January 2016 Unclear as the NP is not specific about unit no's on some sites. Our analysis suggest the NP allocates land for circa 512 dwellings – but they are all accounted for in the commitments	512 already in commitments as have PP/ as allocated sites
East Grinstead	2,126	Referendum 20 th Oct 2016 515 dwellings promoted	113 already in commitments as have PP/ SSHA sites
Haywards Heath	2,204	Referendum 1st December 2016 646 dwellings promoted	150 included in SHLAA
Total from Category 1 settlements	6,708	898 as 113 in EG, 512 in Burgess Hill and 150 in Haywards Heath already accounted for in commitments /SHLAA	

Category 2 settlement

Parish	HEDA	NP status and housing numbers allocated	Position in terms of MSDC's commitments
Cuckfield	279	Made 2014 Land for 29 units identified	25 in commitments 4 already built out
Hassocks	630	Reg 16 submission – June 2016 3 – allocations: Hassocks Golf Club (130 dwellings) ¹ Land North of Clayton Mills (140 dwellings) National Tyre Centre (20 dwellings) 290 units in total	
Hurstpierpoint & Sayers Common	560	Made March 2015 Land for 252 units identified in Hurstpierpoint and an additional 30 – 40 in Sayers Common (a cat 3 settlement)	All 252 in HPP have PP and are in the commitments. The 30 – 40 in Sayers Common are not identified and thus cannot be said to be deliverable
Lindfield Rural Lindfield	478 204	Made –March 2016 No sites allocated	0
Crawley Down – Worth	804 Worth parish as a whole	Made 28 January 2016 No sites allocated	0
Copthorne – Worth	804 Worth parish as a whole	Still pre submission	
Total from category 2 settlements	2955 (Worth counted just once)	290 (in Hassocks) as 321 already accounted for in MSDC's commitments and 40 in Sayers Common cannot be said to be deliverable as site not identified	

¹ App in – DM/16/1775

Category 3 settlement

Parish	HEDA	NP status and housing numbers allocated	Position in terms of MSDC's commitments
Albourne	51	Made 21st September 2016 Promotes the development of 2 units	
Ardingly	144	Made 2015 Land for 37 units identified	Already accounted for in MSDC's commitments – granted on appeal pre NP
Ashurst Wood	143	Made 29 th June 2016. Land for 87 units identified	
Balcombe	150	Made 21st September 2016 Land for 42 units	
Bolney	104	Made 21st September 2016 Land for 41 – 45 dwellings identified	6 units already in commitments – as an allocated LP site
Horsted Keynes	126	Reg 14 consultation ended May 2016 3 sites allocated – 2 provide 16 dwellings and 1 provides for an extra care facility	
Turners Hill	150	Made March 2016 Land for 44 units identified	All 44 counted for in MSDC's commitments – none have pp
West Hoathly	168	Made April 2015 Land for 55 units identified	All 55 are accounted for in MSDC's commitments – none have pp
Total from category 3 settlements	1,036	182 – 186 as 142 already accounted for in MSDC's commitments	

Total NP provision:-

Total from category 1 settlements	898 as 113 in EG, 512 in Burgess Hill and 150 in Haywards Heath already accounted for in commitments /SHLAA
Total from category 2 settlements	290 (in Hassocks) as 421 already accounted for in MSDC's commitments/ cannot be said to be deliverable
Total from category 3 settlements	182 – 186 as 142 already accounted for in MSDC's commitments
Total	1370 – 1374 as 1338 already accounted for in MSDC's commitments/ cannot be said to be deliverable

Notes

The category 3 settlements were defined in the MSDP Pre-Submission Draft June 2015 as:- Albourne, Ardingly, Ashurst Wood, Balcombe, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill and West Hoathly.

Work on the Slaugham NP – which includes Handcross and Pease Pottage - was abandoned after the Examiner's report of January 2014

In addition to the above I also be note that the Twineham Neighbourhood Plan provides for around **20** new homes on unidentified sites across the plan period, and the Ansty & Staplefield Neighbourhood Plan (which the Examiner's Report concludes, subject to modifications, should proceed to Referendum), allocates land for **26** dwellings

On the basis of the above the Further Mods of August 2016 suggest the NP's / site allocations DPD should provide for **2,262 dwellings** over and above the commitments. BP18 advises that this is made up of 2022 dwellings from NP's and 239 from SHLAA sites - para 4.3/ table 4 of BP18.

However of the 5 SHLAA sites mentioned in BP18, we note that the main one – land at Hurst Farm, Hurstwood Lane, Haywards Heath (identified for 150 dwellings), is the same as the site allocated in the Haywards Heath NP for 350 dwellings. We have placed this commitment with the SHLAA to avoid double counting

Having regard to the above MSDC can only demonstrate circa 1420 dwelling (max) as new commitments from NP's and 239 from SHLAA sites (if the matters identified in BP18 are overcome).

This amounts to 1659 dwellings against a target of 2262 – i.e. 604 short of the target, with only Slaugham and Copthorne NP to be published.

Summary of East Grinstead NP Sites

	Site	No units	Comments
1	St Lukes Hospital and Church	15	PP
2	1-25 Bell Hammer	28	PP for 28 sheltered units
3	Warrenside	14	PP
4	Meadway Garage	9	
5	Windmill Lane/London Road	35	SSH DPD allocation
6	Imberhorne lane car park	18	
7	67-69 railway Approach	7	PP
8	Post Office	12	
9	Cantelupe House	14 ²	PP
10	Imberhorne Lower School	200	Questionable deliverability – DMH know more – WSCC not releasing the site for at least 5 – 10 years – see reps to EGNP
11	Ashplats House	45	
12	Queens Walk	120	App for 129
Total		517 ³	113 already in commitments

Summary of Haywards Heath NP Sites

	Site	No units	Comments
1	Land at Hurst Farm Hurstwood Lane	200	Nb total is 350 but 150 accounted for in the SHLAA process – this cannot be counted twice and we have thus excluded it under the NP figure
2	Land South of Rocky Lane and West of Weald Rise and Fox Hill Village.	190	Nb it was 150 – the inspector increased it to 190 by increasing the density – see para 6.9.25 of his report
3	Caru Hall	12 units	
4	Rear of Devon Villas	10 units	
5	Land at Bolnore Road	24 units	
6	Harlands Road Car Park	40 units	Not currently available – cannot be included in first five years
7	Land at Downlands Park	20 units	C2 not C3
Total		496	150 in SHLAA

² Allocated for 12 – pp for 14

³ Plan is for 515 but PP have increased this by 2

Summary of Burgess Hill NP Sites

	Site	No units	Comments
TC1	Civic and Cultural quarter	Unknown	
TC3	The Brow Quarter	242	Accounted for in commitments as having pp (142 BHTC) and 100 as a NP allocation
TC5	Station Quarter	150	Already included in commitments
S1	Victoria Road	Circa 80	Already included in commitments /as PP's on p19 of HIP
LR1	Leylands Park	40	Already allocated/ part of Burges Hill Northern arc
Total		512	All included in commitments



Appendix 5

Analysis of Housing Commitments

Analysis of Housing Commitments in Mid Sussex District Council

Based upon information prepared by Intelligent Land concerning land at Hill Place Farm

Based upon Mid Sussex DC Strategic Housing Land Availability Assessment (SHLAA) April 2016

LPA no.	Application Ref	Site Address	Ward	Overall Total	Overall losses (gross)	Overall Completions (net)	Total remaining (net)	5 year supply	Forum 5YHLS*
Large Allocations without Planning Permission									
1	Allocation	North of Rookery Farm, Rocky Lane, Haywards Heath	Ansty & Staplehurst	55	0	0	55	55	0
2	Allocation	Station Yard/car park, Burgess Hill	Burgess Hill	100	0	0	100	0	0
3	Allocation	The Oaks Centre, Junction Road, Burgess Hill	Burgess Hill	12	0	0	12	0	0
4	Allocation	G&W Motors, London Road, Bolney	Bolney	10	0	0	10	0	0
5	Allocation	Open Air Market, Burgess Hill	Burgess Hill	0	0	0	0	0	0
6	Allocation	Junction of Windmill Lane/London Road East Grinstead	East Grinstead	40	5	0	35	0	0
7	Allocation	Stonequarry Woods, East Grinstead	East Grinstead	40	0	0	40	0	0
8	Allocation	Tennis 7 Squash Club, Ship Street, East Grinstead	East Grinstead	0	0	0	0	0	0
9	Allocation	Station Goods Yard, Hassocks	Hassocks	70	0	0	70	0	0
Total				327	5	0	322	55	0
Neighbourhood Plan Allocation with Planning Permission									
10	NP Allocation	Land at The Brow, Burgess Hill	Burgess Hill	100	0	0	100	0	0
11	NP Allocation	Land at Victoria Road North, Burgess Hill	Burgess Hill	80	0	0	80	80	0
12	NP Allocation	Land at Leylands Park, Burgess Hill	Burgess Hill	20	0	0	20	20	0
13	NP Allocation	The Manor House, 14 Manor Drive, Cuckfield	Cuckfield	15	5	0	10	0	0
14	NP Allocation	Courtmeadow School, Hanlye Lane, Cuckfield	Cuckfield	10	0	0	10	0	0
15	NP Allocation	Old Vicarage Field, Church Road, Cuckfield	Turners Hill	44	0	0	44	44	44

LPA no.	Application Ref	Site Address	Ward	Overall Total	Overall losses (gross)	Overall Completions (net)	Total remaining (net)	5 year supply	Forum 5YHLS*
16	NP Allocation	Blubell Woodland, Sharpthorne	West Hoathly	15	0	0	15	0	0
17	NP Allocation	Land north of Top Road, Sharpthorne	West Hoathly	24	0	0	24	0	0
18	NP Allocation	Land adjacent to Cookhams, south of Top Road, Sharpthorne	West Hoathly	16	0	0	16	16	16
Total				324	5	0	319	160	60
Large Sites 6+ dwellings with Planning Permission									
19		Land South of Rocky Lane, Haywards Heath (Phase 1)	Ansty & Staplehurst	96	0	0	64	64	64
20		Land South of Rocky Lane, Haywards Heath (Phase 2)	Ansty & Staplehurst	101	0	0	101	101	101
21		Sunnybrae, Valebridge Road, Burgess Hill, Lewes DC)	Ansty & Staplehurst	1	1	0	0	0	0
22		Land Adj, Holly Banks, Deaks Lane, Ansty	Ansty & Staplehurst	7	0	0	7	7	7
23		Land between Lodgeland and Standgrove Place, College Lane, Ardingley	Ardinley	36	0	0	36	36	36
24		Land West of London Road, Bolney	Bolney	10	0	0	10	10	10
25		Burgess Hill Town Centre	Burgess Hill	142	0	0	142	142	142
26		Covers Timber Yard 107 Fairfield Road Burgess Hill	Burgess Hill	15	0	0	15	15	15
27		Former Sewage Treatment Works, Burgess Hill	Burgess Hill	325	0	0	325	150	0
28		Land at 152 Leylands Road, Burgess Hill	Burgess Hill	6	0	0	6	6	6
29		Keymar Tile Works, Nye Road, Burgess Hill	Burgess Hill	475	0	0	475	225	225
30		Land East of Kingsway Burgess Hill	Burgess Hill	480	0	0	480	250	250
31		Osborne House Station Road Burgess Hill	Burgess Hill	14	0	0	14	14	14
32		71 Victoria Road, Burgess Hill	Burgess Hill	14	0	0	14	14	14
33		69 Victoria Road, Burgess Hill	Burgess Hill	14	0	0	14	14	14

LPA no.	Application Ref	Site Address	Ward	Overall Total	Overall losses (gross)	Overall Completions (net)	Total remaining (net)	5 year supply	Forum 5YHLS*
34		67 Victoria Road, Burgess Hill	Burgess Hill	12	0	0	12	12	12
35		70 Station Road, Burgess Hill	Burgess Hill	13	0	0	13	13	13
36		Land off Kings Way, East of Gerald Close, Burgess Hill	Burgess Hill	64	1	0	63	64	64
37		Land Parcel East of Ardingly Road, Cuckfield, West Sussex	Burgess Hill	9	0	0	9	9	9
38		Yew Tree Court, London Lane, Cuckfield	Burgess Hill	10	0	0	10	10	10
39		218 London Road, East Grinstead	East Grinstead	14	0	0	14	14	14
40		17 Copthorne Road, Felbridge, East Grinstead	East Grinstead	26	1	0	25	25	25
41		Garland Court, Garland Road, East Grinstead	East Grinstead	49	0	0	49	49	49
42		South of The Old Convent & St Margarets Convent, Adj to Moatfie	East Grinstead	74	0	18	56	56	56
43		Adj Ashplats House, Holtye Road, East Grinstead	East Grinstead	117	0	105	8	8	8
44		1-25 Bell Hammer, East Grinstead	East Grinstead	28	24	0	3	3	3
45		Sussex House, London Road, East Grinstead	East Grinstead	8	0	0	8	8	8
46		St James House, 150 London Road, East Grinstead	East Grinstead	31	0	0	31	31	31
47		St James House, 150 London Road, East Grinstead	East Grinstead	4	0	0	4	4	4
48		St James House, 150 London Road, East Grinstead	East Grinstead	6	0	0	6	6	6
49		Tower Car Sales, Tower Close, East Grinstead	East Grinstead	7	0	0	7	7	7
50		Parish Hall, De La Warr Road, East Grinstead	East Grinstead	8	0	0	8	8	8
51		St Lukes House Vicarage, Holyte Road, East Grinstead	East Grinstead	14	0	0	14	14	14
52		The Vinesong Trust, Warrenside, College Lane, East Grinstead	East Grinstead	14	0	0	14	14	14
53		4-6 Swan Court, London Road, East Grinstead	East Grinstead	3	0	0	3	3	3

LPA no.	Application Ref	Site Address	Ward	Overall Total	Overall losses (gross)	Overall Completions (net)	Total remaining (net)	5 year supply	Forum 5YHLS*
54		Mead House, Cantelupe Road, East Grinstead	East Grinstead	21	0	0	5	5	5
55		Former Caffyns Garage, King Street, East Grinstead	East Grinstead	12	0	0	12	12	12
56		Farringdon House, Wood Street, East Grinstead	East Grinstead	41	0	0	41	41	41
57		1 Chirstopher Road, East Grinstead	East Grinstead	16	0	0	16	16	16
58		1 Chirstopher Road, East Grinstead	East Grinstead	10	0	0	10	10	10
59		151 London Road, East Grinstead	East Grinstead	4	0	0	4	4	4
60		151 London Road, East Grinstead	East Grinstead	12	0	0	12	12	12
61		Home, 3 Cantelupe Mews, East Grinstead	East Grinstead	8	0	0	8	8	8
62		Superdrug, 78 London Road, East Grinstead	East Grinstead	7	0	0	7	7	7
63		Land at Blackwell Farm Road, East Grinstead	East Grinstead	10	0	0	10	10	10
64		South of Phoenix House, Cantelue Road, East Grinstead	East Grinstead	12	0	0	12	12	12
65		Stafford House, 91 Keymar Road, Hassocks	Hassocks	14	0	0	14	14	14
66		North of 99 Reed Pond Walk Franklands Village Haywards heath	Haywards Heath	18	0	0	18	18	18
67		East of hospital playing field (Parcel Y), Haywards heath	Haywards Heath	132	0	115	17	17	17
68		Oldfield, 55 Lewes Road, Haywards Heath	Haywards Heath	10	0	0	10	10	10
69		The Oaks, 36 Paddockhall Road, haywards heath, West Sussex	Haywards Heath	14	5	0	9	9	9
70		1-3 Church Road, Haywards Heath	Haywards Heath	43	0	0	43	43	43
71		Burns House, Harlands Road, Haywards heath	Haywards Heath	8	0	0	8	8	8
72		6 Heath Square, Boltro Road, Haywards heath	Haywards Heath	9	0	0	9	9	9
73		Bolnore Village Phases 4b & 5, South West of Haywards heath	Haywards Heath	181	0	0	136	136	136

LPA no.	Application Ref	Site Address	Ward	Overall Total	Overall losses (gross)	Overall Completions (net)	Total remaining (net)	5 year supply	Forum 5YHLS*
74		Bolnore Village Phase 4a	Haywards Heath	192	0	186	6	6	6
75		Grosvenor Hall, Bolnore Road, Haywards Heath	Haywards Heath	10	0	0	10	10	10
76		Land to the West of Beech Hurst, Butlers Green Road	Haywards Heath	10	0	0	10	10	10
77		Penland Farm, Balcombe Road, Hayward Heath	Haywards Heath	210	0	0	210	210	210
78		Mid Sussex Magistrates Court, Bolnore Road	Haywards Heath	36	0	0	36	36	36
79		Norris House, Burrell Road, haywards heath	Haywards Heath	30	0	0	30	30	30
80		Milton House, Milton Road, Haywards Heath	Haywards Heath	28	0	0	28	28	28
81		L/A Larchwood, Anscombe Woods Crescent, Haywards heath	Haywards Heath	10	0	0	10	10	10
82		Land between The Willows and Bennetts Rise, Southdowns Park	Haywards Heath	13	0	0	13	13	13
83		11 Boltro Road, Haywards Heath	Haywards Heath	7	0	0	7	7	7
84		Beacon Heights, 4 Church Road, Haywards heath	Haywards Heath	24	0	0	24	24	24
85		Land at Gamblemead, Fox Hill, Haywards Heath	Haywards Heath	99	0	0	99	99	99
86		L/A Oldfield, 55 Lewes Road, Haywards Heath	Haywards Heath	7	0	0	7	7	7
87		Land to the rear of 151 Western Road, Haywards Heath	Haywards Heath	14	0	0	14	14	14
88		Ravenswood Hotel, Horsted Lane, Sharpthorne	Horsted Keynes	12	0	0	12	12	12
89		Land north of Fairfield Recreation Ground, Chalkers Lane	Hurstpierpoint and Sayers	61	0	0	61	61	61
90		Sussex House, 23 Cuckfield Road	Hurstpierpoint and Sayers	6	0	0	6	6	6
91		Land to north of Little Park Farm	Hurstpierpoint and Sayers	140	0	0	140	140	140

LPA no.	Application Ref	Site Address	Ward	Overall Total	Overall losses (gross)	Overall Completions (net)	Total remaining (net)	5 year supply	Forum 5YHLS*
92		Land north of Highfield Drive	Hurstpier-point and Sayers	17	0	0	17	17	17
93		Land to the east of Gravelye Lane and South of Scamps Hill	Lindfield Rural	230	0	72	158	158	158
94		Buxshalls, Ardingly Road, Lindfield, West Sussex	Lindfield Rural	40	21	0	19	19	19
95		Springfield Farm, Lewes Road, Scaynes Hill	Lindfield Rural	6	0	0	6	6	6
96		Land at Caburn and St Gorges House, Brighton Road, Handcross	Slaugham	7	0	0	7	7	7
97		Golf Course Driving Range, Horsham Road, Pease Pottage	Slaugham	95	0	0	95	95	95
98		Seaspace House, Brighton Road, Handcross	Slaugham	7	0	0	7	7	7
99		Land at Hyde Estate, Handcross	Slaugham	90	0	0	90	90	90
100		Sherwood Works, Brighton Road, Handcross	Slaugham	7	0	0	7	7	7
101		Allotment Gardens, High Street, Handcross	Slaugham	6	0	0	6	6	6
102		Clock Field, North Street, Turners Hill	Turners Hill	47	0	0	47	47	47
103		Pasture Wood, Hophurst Lane, Crawley Down	Worth	9	0	0	9	9	9
104		Land east of Woodlands Close, Crawley Down (Phase 1)	Worth	46	1	2	3	3	3
105		Land off Woodlands Close, Crawley Down (Phase 2)	Worth	51	0	0	51	51	51
106		Land at Holly Farm, Copthorne Way, Copthorne	Worth	50	0	0	45	50	50
107		Land west of Copthorne, Copthorne Way	Worth	500	0	0	500	300	90
108		Land at Wychwood, Turners Hill Road, Crawley Down	Worth	23	0	0	23	23	23
109		Palmers Autocentre Turners Hill Road, Crawley Down	Worth	8	0	0	8	8	8
Total				4977	54	498	4282	3433	3073

LPA no.	Application Ref	Site Address	Ward	Overall Total	Overall losses (gross)	Overall Completions (net)	Total remaining (net)	5 year supply	Forum 5YHLS*
District Plan Allocations									
110		Burgess Hill			0	0		515	255
111		Pease Pottage			0	0		150	450
Total				0	0	0	0	665	700
Small Sites									
112		Various					317	317	317
Total							317	317	317
SHLAA Sites									
113		Various						239	239
Total Net Deliverable								239	239
Sub Total Supply 2016-2021							5,240	4,869	4,394
Total supply 2016-2021							5,240	4,869	3,955*

*Includes a 10% deduction due to non implementation rate



Appendix 6

Mid Sussex Developers Forum - Terms of Reference

Mid Sussex Developers Forum

16th September 2016

Shared Agenda

All members of the Developers Forum wish for a sound process to enable the delivery of development through the planning process, to achieve:

- A good District Plan
- Sustainable development enabling more housing and associated infrastructure delivery
- A fair, open and efficient process

All members would like this message appropriately communicated with officers and Members.

Terms of Reference

- The Developers Forum shall comprise the inaugural members plus any invited landowner/developer/ housebuilder who has site interests comprising 50 units plus, and who needs to promote land through the development plan process.
- The Forum shall not be secretive and appropriate liaison with Mid Sussex District Council shall be taken, which will involve an invite to Forum meetings. The Leader and Chief Executive, Councillors and key officers will be made aware of the Forum.
- In addition, key stakeholders may be invited to the Forum, for example the Coast to Capital LEP, County Council, adjacent Authorities or the Highways Agency.
- The purpose of the Forum is to discuss 'Strategic Matters' defined as being of collective interest, notably:
 - Duty to co-operate
 - Housing and development needs ('OAN')
 - The delivery of the District Plan / policies / housing trajectory / 5 year housing land supply
 - Gatwick Airport / any expansion implications
 - How Neighbourhood Plan(s) can be made fit for purpose (chain of conformity) and the alternatives available
 - Political intelligence
 - Communication between the public authorities and developers
 - District Council resourcing
- The Forum shall discuss, and seek to agree a 'Collective Opinion' of:
 - The District Plan submission / and Examination process relevant to strategic matters
 - All relevant Strategic Matters
- The Forum shall consider the pooling of the evidence base:
 - Shared evidence with respect to housing needs
 - Shared evidence with respect of other strategic planning matters (i.e. Neighbourhood Plans)
- The Forum shall seek to agree collective communications strategy and political liaison, to the mutual benefit of the Forum members. The communications strategy shall also involve the press and public.
- The Forum shall meet every six weeks, or quarterly, as required.
- No decision of the Forum shall be binding on any member.
- Should the Forum not reach a collective, then any member may seek to agree the said matter with any other member of the Forum, separate to the Forum.
- The Forum shall not be site specific
- Savills / Cratus will administer the Forum for an initial 12 month period, which will then be subject to a review.

Mid Sussex Developers Forum

Examination into the soundness of the Mid Sussex District Plan 2014-2031



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