

**Appeal by Fairfax Acquisitions Limited, The
Norris Family and Mid Sussex District Council**

Land to the East of Ansty Way, Cuckfield Bypass,
Cuckfield, West Sussex

Appeal Ref: 6002030

LPA Ref: DM/23/2866

Proof of Evidence – Affordable Housing Matters

Annie Gingell (BSc (Hons) MSc MRTPI)

May 2026

Contents

1.	Introduction	3
2.	Affordable Housing Offer	7
3.	Relevant Planning Policy and Guidance	8
4.	Affordable Housing Needs	17
5.	Past Affordable Housing Delivery	28
6.	Market Conditions	35
7.	Future Supply of Affordable Housing	46
8.	Justification and Associated Benefits	52
9.	Summary	58
Appendix AG1: Freedom of Information Response		
Appendix AG2: Core Documents List		
Appendix AG3: Relevant NPPF Extracts		
Appendix AG4: Relevant NPPG Extracts		
Appendix AG5: Data Tables		
Appendix AG6: Relevant Decisions Summary		
Appendix AG7: Future Supply Analysis		

Contact

Annie Gingell
annie.gingell@turley.co.uk

Client

Fairfax Properties

Our reference

05129

May 2026

1. Introduction

- 1.1 My name is Annie Gingell, and I am an Associate Director at **Turley**. I am instructed to present affordable housing evidence at this Inquiry by **Fairfax Acquisitions Limited and The Norris Family**, herein referred to as ‘the Appellant.’
- 1.2 This Appeal follows the refusal by Mid Sussex District Council (‘the Council’) of an outline planning application for up to 1,450 dwellings at Land to the East of Ansty Way, Cuckfield Bypass, Cuckfield, West Sussex (‘the Appeal Site’).
- 1.3 My evidence specifically addresses affordable housing provision and the weight to be attributed to this benefit in the planning balance, taking into account evidence of local needs and delivery as well as a range of other affordable housing need and affordability indicators.
- 1.4 It concludes that there is a genuine need for the proposed affordable homes now, and that **substantial positive weight**¹ should be attributed to the provision of affordable housing at the appeal site in the planning balance.
- 1.5 As part of my evidence, I have obtained and relied upon data from the Council through a Freedom of Information (FOI) request, available at **Appendix AG1**.
- 1.6 The evidence which I have prepared and provide for this Appeal (PINS Reference No. 6002030) is true and has been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are true and professional opinions.

Qualifications

- 1.7 I hold a Bachelor of Science (Hons) degree in City and Regional Planning from Cardiff University (2016) and a Master of Science degree in Spatial Planning and Development also from Cardiff University (2020).
- 1.8 I am a chartered member of the Royal Town Planning Institute (RTPI) with over 10 years professional experience in the field of town planning and housing.
- 1.9 I joined Turley in October 2024 as an Associate Director. Prior to joining Turley, I was an Associate Director at Tetlow King Planning, having joined the company in 2017 as a Graduate Planner. Prior to this I worked as a Planning Policy Officer in Local Government at Bristol City Council. During my undergraduate degree I worked as an Assistant Planner at Pegasus Group primarily on Section 78 appeals.
- 1.10 During my career, I have presented evidence at numerous Section 78 appeals in the West Midlands, North West, South West, South East, East of England, and London. I have acted

¹ For clarity, the weightings I apply are as follows: none, neutral, very limited, limited, moderate, significant, very significant, substantial, and very substantial.

on a wide range of housing issues and projects for landowners, house builders, and housing associations throughout the country.

- 1.11 I also sit on the British Property Federation (BPF) Affordable Housing Committee, and I am a network leader for Neurodiversity in Planning (NiP) and a national co-Chair of Women in Planning (WiP).

Government Commitments to Affordable Housing Delivery

- 1.12 The importance of affordable housing provision in the planning balance is reinforced by the clear direction set by the current Government. Recent statements by senior members of Government demonstrate that affordable housing delivery is at the centre of current housing policy and planning reform:

- **30 July 2024:** The then Deputy Prime Minister Angela Rayner, in the '**Housing targets increased to get Britain building again**' press release stated that *"our new flexibilities for councils will boost the number of social and affordable homes, and give working families a better route to a secure home"*, signalling an intention to adapt the plan-led system to improve delivery.
- **30 July 2024:** The then Deputy Prime Minister Angela Rayner, in the '**Building the homes we need**' press release stated that *"the Government is committed to the biggest growth in social and affordable housebuilding in a generation. As of 2023, there were 3.8 million Social Rent homes – 200,000 fewer than the four million that existed in 2013. According to revised figures we are publishing today, only 110,000 to 130,000 homes are now due to be delivered under the Affordable Homes Programme, down from an aspiration of 'up to 180,000' when it was launched"*. The Government proposed a number of changes in planning policy designed to support the delivery of affordable homes.
- **28 October 2024:** In a Written Ministerial Statement on '**Social and Affordable Housing: Next Steps**' (HCWS169), the then Deputy Prime Minister Angela Rayner stated that the announcements in the Budget *"will enable councils to scale-up delivery of much needed social homes whilst still enabling longstanding tenants to buy their own homes"*, confirming the Government's commitment to expand affordable delivery.
- **20 November 2024:** In her closing speech at the **Social Housing Annual Conference**, the then Deputy Prime Minister Angela Rayner stated that *"no longer will social housing be seen as an after-thought, or worse actively discouraged... we want to build more social homes than we lose"*, emphasising the need to embed affordable housing at the heart of planning and delivery.
- **12 December 2024:** In a press release on '**Planning overhaul to reach 1.5 million new homes**', the then Deputy Prime Minister Angela Rayner stated that *"I will not hesitate to do what it takes to build 1.5 million new homes over five years and deliver the biggest boost in social and affordable housebuilding in a generation. We must all do our bit and we must all do more. We expect every local area to adopt a plan to meet their housing need."* underlining the scale of the Government's ambitions.

- **12 December 2024:** The Housing Minister, Matthew Pennycook, in the ‘**Building the homes we need**’ press release stated that *“rapidly driving up planning consents in the context of a system with woefully inadequate local plan coverage will increase the number of permissions secured outside of local plan allocations in the short-term. This is necessary if we are to see the scale of delivery we need to meet our commitment to 1.5 million homes. **Therefore, where it applies, the presumption in favour of sustainable development must have real teeth**”* reflecting the weight of national planning policy and the reality of what will be required to deliver the Government’s housing ambitions.
- **11 March 2025:** In a press release on the Planning and Infrastructure Bill titled ‘**Biggest building boom**’ in a generation through planning reforms’, the then Deputy Prime Minister Angela Rayner and Housing Minister Matthew Pennycook stated that *“Homes and key infrastructure that hundreds of thousands of hard-working people and families need will be built quicker thanks to transformative reforms to get Britain building, tackle blockers and unleash billions in economic growth”*.
- **16 December 2025:** In the Written Ministerial Statement ‘**Planning Reform: Next Phase**’ (HCWS1187), Matthew Pennycook re-affirmed that *“England remains in the grip of a housing crisis that is both acute and entrenched. The detrimental consequences of this disastrous state of affairs are now all pervasive: a generation locked out of homeownership; 1.3 million people languishing on social housing waiting lists; millions of low-income households forced into unaffordable private rented housing; and more than 170,000 homeless children living in temporary accommodation.”*
- **28 January 2026:** The Government published ‘**Delivering a decade of renewal for social and affordable housing**’. The document confirms that the Government is pursuing *“the biggest increase in supply in a generation”* and identifies pressures in the social and affordable housing sector, including over 1.3 million households on waiting lists and homeownership amongst young people having halved in the last 35 years; average household renting privately spending over 30% of their income on rent; and 15% of households living in poor-quality housing.
- **28 January 2026:** In a Written Ministerial Statement ‘**Social and Affordable Housing Renewal: Progress Update**’ (HCWS1283), the Government confirmed progress on the implementation of its five step plan to deliver a decade of social and affordable housing renewal. The Statement confirms next steps in relation to grant funding, regulation, sector capacity, and council housebuilding, and was issued to provide *“clarity and certainty”* ahead of the opening of bidding for the new Social and Affordable Homes Programme.

1.13 Together, these ministerial statements and speeches confirm that current Government policy places the delivery of affordable housing, secured through the planning system, at the forefront of national housing priorities. This national direction provides important context for the local evidence considered in this Statement.

Scope of Evidence

- 1.14 My evidence comprises this Proof of Evidence, associated Core Documents ('CDs'), and an accompanying volume of Appendices. The Core Documents referred to in this evidence are listed at **Appendix AG2**.
- 1.15 This Proof of Evidence comprises the following sections:
- Section 2 - Affordable Housing Offer
 - Section 3 - Relevant Planning Policy and Guidance
 - Section 4 - Affordable Housing Needs
 - Section 5 - Past Affordable Housing Delivery
 - Section 6 - Market Conditions
 - Section 7 - Future Supply of Affordable Housing
 - Section 8 - Justification and Associated Benefits
 - Section 9 - Summary
- 1.16 My evidence should be read alongside the main Planning Evidence and Five-Year Housing Land Supply Evidence of Steven Brown (Woolf Bond Planning) (**CD8.1**). It should also be read alongside the overarching Planning Statement of Common Ground (SoCG) (**CD7.1**) which has been agreed between the parties.

2. Affordable Housing Offer

- 2.1 The proposed development is for up to 1,450 dwellings, of which 30% (up to 435 homes) are to be provided on-site as affordable housing.
- 2.2 This level of provision meets the expectations of Policy DP31 of the Mid Sussex District Plan (2018) which seeks 30% provision from qualifying developments.
- 2.3 The proposed tenure split of the affordable housing units is set out in Table 2.1 below.

Table 2.1: Tenure Split of Affordable Housing Units

Tenure	No. Affordable Units	%
Affordable Rent	326	75%
First Homes	109	25%
Total	435	100%

- 2.4 As set out in Paragraph 12.33 of the Committee Report (**CD3.1**), the tenure split aligns with the requirements of District Plan Policy DP31. Paragraph 12.36 of the Committee Report goes on to confirm that the scheme would provide a policy compliant affordable housing provision.
- 2.5 The affordable housing provision will be secured through a Section 106 Planning Obligation.

3. Relevant Planning Policy and Guidance

Introduction

- 3.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan as a whole unless other material considerations indicate otherwise.
- 3.2 This section identifies the relevant adopted and emerging Development Plan documents for the provision of affordable housing at the appeal site; as well as any pertinent material considerations. It also identifies the relevant policy context set out in the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (NPPG).

The Development Plan

Mid Sussex District Plan (March 2018) – CD5.1

- 3.3 The Mid Sussex District Plan was adopted in March 2018 and covers the 17 year period between 2014 and 2031. It sets out a vision for how Mid Sussex aims to evolve and a delivery strategy for how that will be achieved. It includes policies relating to the control and provision of affordable housing.
- 3.4 The District Plan recognises the need for affordable homes throughout the document. In particular:
- In the Forward, Cllr Andrew MacNaughton states *“The Plan seeks to address a number of local issues, including housing provision, and commuting patterns. This is one of the highest quality places to live in the country, and housing is relatively unaffordable to many with high numbers of people travelling outside the District for work. The District Plan makes provision for more homes and jobs, to make homes more affordable and accessible to enable people to live and work in the District.”*
 - Paragraph 2.9 (page 6) recognises that house prices in Mid Sussex are high relative to average incomes, and this causes affordability issues, particularly for young people.
 - Paragraph 3.10 (page 16) confirms a central aim of the Plan is to ensure that housing needs can be met over the Plan period.
- 3.5 **Policy DP28 (Accessibility)** (page 79) requires 4% of affordable dwellings to be built to Building Regulations M4(3), suitable for wheelchair users. This figure is dependent on the suitability of each individual site, and the need at the time.
- 3.6 **Policy DP30 (Housing Mix)** (page 82) states that to support sustainable communities, housing development will provide a mix of dwelling types and sizes from new development (including affordable housing) that reflects current and future local housing needs.

- 3.7 **Policy DP31 (Affordable Housing)** (pages 83-84) serves as the primary policy for affordable housing provision in Mid Sussex. It states the Council will seek the provision of a minimum of 30% on-site affordable housing from all residential developments providing 11 dwellings or more. A mix of tenure of affordable housing, normally approximately 75% social or affordable rented homes, with the remaining 25% for intermediate homes, unless the best available evidence supports a different mix.
- 3.8 Monitoring indicators are included for each policy on pages 102 to 110 of the District Plan. For policy DP31, it states that the indicators for affordable housing provision will be the *'number of affordable homes completed annually (gross)'*, and *'financial contributions towards housing provision'*. In relation to the target the Council should achieve, this is stated as: *'maximise in compliance with DP31: Affordable Housing'*.

Ansty, Staplefield and Brook Street Neighbourhood Plan (February 2017) – CD5.7

- 3.9 The Ansty, Staplefield and Brook Street Neighbourhood Plan was made in February 2017 and provides a vision of future development within the parish for the 16 year period between 2015 and 2031. The Neighbourhood Plan is now more than 5 years old and has not been reviewed.
- 3.10 The Neighbourhood Plan provides a 'Profile of the community today' (page 9). With regard to housing, it states that there are 677 dwellings in the parish. At paragraph 2.24 (page 10), it recognises there are:
- *"More than 50% of these dwellings are detached, more than double the national average;*
 - *There is above average owner occupation with few social rented properties;*
 - *The affordability ratio is well above the national average, with average house prices more than 20 times the median incomes for the lowest 25% of household incomes;*
 - *The average price of a detached property is over 40% higher than the national average".*
- 3.11 At paragraph 3.1 (page 15), the Neighbourhood Plan sets out the 'Challenges for Ansty & Staplefield'. It recognises the challenge includes a lack of affordable housing for parish residents.
- 3.12 The 'Vision for Ansty, Staplefield and Brook Street' (page 15) confirms *"Ansty will have accommodated new housing to help meet the demand and need for new and affordable homes by using land within or close to the established settlement boundary"*.
- 3.13 The objectives of the Neighbourhood Plan at paragraph 3.3 (page 16) include *"to contribute to meeting the local housing need, including affordable housing for those with a local connection to the parish"*.
- 3.14 Paragraph 5.7 (page 23) recognises there is disparity between the Housing Register and the Housing Needs Survey. It states:

“The Housing Register will have lower figures than the Housing Needs Survey because many people will not put themselves on the Housing Register because they do not consider that there is any reasonable prospect of securing a home this way. What this does reinforce is that the need for affordable housing is focussed on smaller properties.”

- 3.15 **Neighbourhood Plan Policy AS4 (Housing Mix)** serves as the primary policy for housing mix within the Ansty, Staplefield and Brook Street Neighbourhood Plan area (page 24). It states:

“Residential developments must provide a mix of dwelling sizes (market and affordable) that reflect the best available housing evidence. In the early part of the plan period, the housing evidence indicates a particular emphasis on the provision of 1- and 2-bed dwellings. It is therefore expected that in the early part of the plan period developments will provide a mix of dwellings include the provision of 1 and 2 bedroom dwellings to reflect the local housing need.”

- 3.16 The Neighbourhood Plan provides its definition of affordable housing within the glossary on page 39. However, this is based on the original 2012 NPPF definition of affordable housing, which was in place at the time of its production. It is not reflective of the wider definition of affordable housing contained within the current 2024 NPPF.

Cuckfield Neighbourhood Plan (October 2014) – CD5.6

- 3.17 The Cuckfield Neighbourhood Plan was made in October 2014. It covers the 20 year plan period between 2011 and 2031. The Neighbourhood Plan is now more than 5 years old and has not been reviewed.
- 3.18 Section 1.2 (‘Housing’) (page 15) confirms the Housing Needs Survey 2012 has revealed a local need for market and affordable housing. This is reflected in the Housing Objectives of the Neighbourhood Plan set out at Section 4.2 (page 40). Indeed, the second housing objective seeks to ensure an adequate supply of affordable housing to meet the needs of the Parish.
- 3.19 Section 4.2 (Housing) sets out the Cuckfield Housing Stock, confirming there are 1,439 dwellings in Cuckfield Parish in 2011 with the majority of homes being owner occupied. There is a predominance of family housing with 71% homes having 3 bedrooms or more (page 40).
- 3.20 **Neighbourhood Plan Policy CNP 8 (Affordable Housing)** serves as the primary policy for affordable housing provision within the Cuckfield Neighbourhood Plan Area (page 51). The Affordable Housing requirements are as follows:
- (a) On sites able to accommodate four or more dwellings, it will be expected that the equivalent of a 30% affordable housing provision will be made on-site subject to viability considerations.
 - (b) The type of affordable housing provision should reflect local needs, and shared ownership provision for smaller households is particularly encouraged.

(c) The location, layout, and design of the affordable housing within the scheme should create an inclusive development.

- 3.21 With regards to Monitoring Indicators of Policy CNP 8, the Plan states it will monitor the number of new shared ownership dwellings delivered within the Parish area during the Plan period (net) (page 51). The target for Policy CNP 8 is for all new developments to have more than 50% shared ownership on all affordable schemes (page 51).

Other Material Considerations

National Planning Policy Framework (December 2024) – CD6.1

- 3.22 The latest NPPF was published on 12 December 2024 and outlines the government's planning policies for delivering affordable housing in England within the broader context of sustainable development (paragraph 8) and in support of the Government's objective of significantly boosting the supply of homes (paragraph 61).
- 3.23 **Appendix AG3** sets out the paragraphs of the NPPF of particular relevance to affordable housing.

National Planning Practice Guidance (2014, Ongoing Updates)

- 3.24 The NPPG is an online resource that provides detailed guidance to support the implementation and application of the NPPF. It was first published in March 2014 and is regularly updated to reflect changes in planning legislation, policies, and best practices.
- 3.25 **Appendix AG4** sets out the paragraphs of the NPPG of particular relevance to affordable housing.
- 3.26 The Mead Realisations Limited v Secretary of State for Levelling Up, Housing and Communities [2025] Court of Appeal Judgment confirms that the NPPG has the same policy status as the NPPF.

Emerging Mid Sussex District Plan Review – CD5.18

- 3.27 The Council is in the process of undertaking a review of the District Plan to cover the 18 year period between 2021 and 2039. The District Plan was formally submitted to the Planning Inspectorate on 8 July 2024 and is therefore being examined under the 2023 NPPF per the transitional arrangements set out at Annex 1 of the 2024 NPPF.
- 3.28 The initially appointed Inspector, Louise Nurser, advised following the conclusion of the Stage 1 hearing sessions in 2025 that the draft Plan had failed to satisfy the Duty to Co-operate. She invited the Council to confirm whether it wished to withdraw the draft Plan or instead request the issue of a formal decision letter.
- 3.29 Following discussions between the Council and the Planning Inspectorate, including in light of the Government's proposal to abolish the Duty to Co-operate, it was agreed that the examination could be re-opened. Jonathan Bore was subsequently appointed as Inspector to oversee the Stage 2 hearing sessions which were held over a period of three weeks between 24 February 2026 and 19 March 2026.

- 3.30 In light of the significant unmet needs arising from neighbouring authorities the Inspector asked the Council to review its assessment of sites with a view to identifying further allocations in order to meet a higher housing requirement, which he has suggested should be “towards the upper end” of the range from 1200-1300 dpa. The Council is currently undertaking this work, which will include a reappraisal of all sites previously rejected, including the Appeal Site.
- 3.31 The Regulation 19 draft Plan as submitted makes a few references to affordable housing including:
- Under the sub heading ‘Social Characteristics and Challenge’ on pages 15 to 16 the document states that *“Although affordable homes are consistently being delivered in the District, the need for affordable homes is not met by existing or planned supply”* and that *“There is a need for affordable housing in Mid Sussex where house prices are high compared to incomes.”*
 - Page 18 sets out the features of the ‘20-minute neighbourhoods’ concept in the TCPA (Town and Country Planning Association) guidance which includes “Diverse and affordable homes”.
 - In respect of affordable housing need page 14 sets out that the 2021 SHMA (Strategic Housing Market Assessment) highlights the clear need for both social and affordable rented housing. The net need for affordable homeownership housing is smaller, albeit its provision will support some of those households currently unable to access market housing as they fall within the rent/buy ‘gap’ or experience barriers in obtaining a mortgage.
- 3.32 **Draft Policy DPH7 (Housing Mix)** on page 147 outlines the intended housing mix principles for the District. It states the Policy will *“provide a mix of dwelling types and sizes that reflects current and future local housing needs.”* It establishes an indicative tenure mix between affordable homeownership and rented affordable homes, drawing on the findings of the 2021 SHMA as a baseline.
- 3.33 **Draft Policy DPH8 (Affordable Housing)** (page 151) requires a minimum of 30% on-site affordable housing, on all residential and mixed-use developments providing 10 dwellings or more. The draft policy sets out the following requirements:
- The full 30% affordable housing requirement to be provided on each and every phase of a phased development.
 - A mix of affordable housing tenure comprising 25% First Homes and 75% social or affordable rented, unless the best available evidence supports a different mix is required.
 - A minimum of 4% of affordable housing units to be wheelchair accessible M4(3)(2)(b) units is required.
 - All affordable housing units to be fully integrated into the scheme layout.

- Affordable housing units to be ‘tenure blind’ so that affordable and private homes are indistinguishable from one another.
- 3.34 **Emerging Policy DPH9 (First Homes)** (page 154) sets out the 25% requirement for First Homes as part of the affordable tenure split, stating the Government’s May 2021 Written Ministerial Statement and amended PPG as reasons for its inclusion.
- 3.35 In January 2026, the Council published the MS-TP2 Housing Topic Paper (**CD14.1**) response to Inspector Bore’s initial letter. Section 5 (page 25) of the topic paper concerns Affordable and Specialist Housing Needs and highlights the following:
- The findings of the 2024 SHMA Update do not change the conclusions of the 2021 SHMA or require a change to the wording of draft Policy DPH8 (**p.25, [4.27]**).
 - The threshold of 30% in draft Policy DPH8 has been tested in the viability appraisal and is set at a level that is financially viable (**p.26, [4.30]**).
 - Based on the conclusions of the 2024 SHMA Update the Council proposes that the wording for policies DPH8 and DPH9 is amended to allow flexibility for how the 25% affordable homeownership element of the affordable housing requirement is delivered (**p.27, [4.34]**).
 - Housing Mix Split table within Policy DPH7 will need to be amended to reflect the findings of the 2024 SHMA Update (**p.27, [4.38]**).
- 3.36 The Topic Paper also notes at paragraph 4.31 that the housing allocations totalling 7,262 dwellings will deliver a minimum of 2,179 affordable homes (i.e. 30% of the total); in addition to the affordable homes in the pipeline through existing planning permissions. Likely affordable housing supply is considered in detail at Section 7 of this evidence.
- 3.37 Given that there remain unresolved objections, the examination is ongoing, and the Plan is subject to potential modification, including the identification of additional site allocations, the draft policies in the emerging District Plan Review can only attract limited weight² in the determination of the appeal proposals.

Affordable Housing Supplementary Planning Document (July 2018) - CD5.3

- 3.38 The Affordable Housing Supplementary Planning Document (SPD) was adopted in 2018. It is intended to provide guidance on how the Council will secure affordable housing.
- 3.39 This SPD specifically relates to District Plan Policy DP31 (Affordable Housing) and DP32 (Rural Exception Sites).
- 3.40 The SPD was prepared in accordance with national policy and guidance that is no longer in effect and pre-dates a number of affordable housing tenures now included in the Annex 2 definition of the 2024 NPPF. As such, the definition of Affordable Housing

² As set out at paragraph 5.13 (page 8) of the Councils Statement of Case (**CD15.2**).

provided within the SPD (page 8) cannot be considered to contain all those who would fall under the updated broader definition from the 2024 NPPF.

- 3.41 At paragraph 2.32 (page 11), the SPD confirms the Council will normally require a balance of 75% social or affordable rented homes and 25% for intermediate homes.
- 3.42 At paragraph 2.34 (page 11), the SPD highlights that there is a firm expectation that the full quota of affordable housing will be provided on the development site where the provision could reasonably be made without making the development unviable.

Development Infrastructure and Contributions Supplementary Planning Document (July 2018) - CD5.5

- 3.43 Mid Sussex District Council adopted the Development Infrastructure and Contributions Supplementary Planning Document in July 2018. It was intended to keep contributions up to date to ensure they reflect cost inflation.
- 3.44 The Council's 'Development Contributions' web page confirms that build costs have risen substantially since the "Development Infrastructure and Contributions" SPD was adopted in July 2018.
- 3.45 As a result, the Council has revoked the SPD for the purposes of determining new applications and will instead rely on more up to date evidence on infrastructure costs. However, the web page also confirms that applications submitted prior to 23 July 2025 will continue to be assessed for Section 106 contributions against the provisions in the SPD.
- 3.46 As such, the appeal proposal, having been submitted prior to this date, falls to be assessed in accordance with the provisions of the SPD, which remains a material consideration in the determination of the appeal.

Five Year Housing Land Supply Position

- 3.47 The Council has confirmed in its Statement of Case (**CD15.2, p14, [6.1]**) that it is currently unable to demonstrate a five-year supply of deliverable housing sites as per the requirements of paragraph 78 of the NPPF.
- 3.48 As such the presumption in favour of sustainable development, as set out in full under paragraph 11 of the NPPF, is engaged. Paragraph 11d(ii) is explicit that particular regard should be had to providing affordable homes. The absence of a 5YHLS underscores the importance of prioritising developments that can deliver much-needed housing, particularly affordable housing.
- 3.49 Section 7 of this evidence provides a detailed assessment of the deliverable supply of affordable housing over the period, considering both the Council's and the Appellant's supply positions.
- 3.50 The provision of affordable housing is a key objective of the NPPF, recognising its critical role in addressing local housing needs and ensuring that communities have access to a

range of housing options. In this context, the Proposed Development must be considered in context of its ability to contribute meaningfully to the delivery of affordable housing within the District.

Consultation Draft National Planning Policy Framework (CD6.2) and Written Ministerial Statement (CD12.6) (16 December 2025)

- 3.51 On 16 December 2025, the Government published a consultation draft of the NPPF alongside an accompanying WMS by the Housing Minister, Matthew Pennycook MP. Taken together, these documents are a material consideration and provide a clear and authoritative statement of the Government’s policy position and intended direction of travel for the planning system.
- 3.52 The WMS sets out an unequivocal assessment of the current housing situation in England. The Housing Minister states that:
- “England remains in the grip of a housing crisis that is both acute and entrenched. The detrimental consequences of this disastrous state of affairs are now all pervasive: a generation locked out of homeownership; 1.3 million people languishing on social housing waiting lists; millions of low-income households forced into unaffordable private rented housing; and more than 170,000 homeless children living in temporary accommodation.”* (emphasis added).
- 3.53 This framing makes clear that the Government views the housing crisis, and particularly the shortage of affordable housing, as a systemic failure requiring urgent and sustained intervention. The WMS confirms that the planning system is central to addressing this crisis.
- 3.54 In particular, the WMS places strong emphasis on securing a more appropriate and diverse mix of homes through the planning system. The Housing Minister states *“Securing a diverse mix of homes. We want to better support the needs of different groups through the planning system.”* The WMS goes on to confirm that this includes *“stronger support for rural social and affordable housing and setting clearer expectations for accessible housing to meet the needs of older and disabled people.”*
- 3.55 This reflects a clear policy intention to strengthen, rather than dilute, national support for affordable and specialist housing provision. The consultation draft NPPF gives effect to this direction of travel through proposed policy changes which strengthen expectations around meeting identified needs and supporting delivery of the right mix of homes including rural social and affordable housing and accessible housing.
- 3.56 Taken together, the Draft NPPF consultation and the accompanying WMS underline the Government’s clear recognition that England’s housing crisis is severe, long standing, and unresolved, and that the planning system has a central role to play in responding to it. The emphasis placed on the scale and consequences of unmet housing need, alongside the stated intention to strengthen support for affordable housing and to secure a more appropriate mix of homes, provides clear policy context for decision making.

Corporate Documents

- 3.57 The Council's corporate documents identify the delivery of affordable housing as a high corporate priority. These include the following documents:
- Corporate Plan and Budget 2025-2026 (**CD14.5**); and
 - Homelessness and Rough Sleeping Strategy 2020-2025 (**CD14.6**).
- 3.58 Relevant quotes from each of these documents are referred to throughout this evidence.

Conclusions

- 3.59 The Development Plan establishes a clear and consistent policy framework which seeks to maximise the delivery of affordable housing, with Policy DP31 requiring a minimum of 30% on site provision and supporting policies (DP28 and DP30) ensuring that provision responds to identified needs in terms of accessibility, size, and mix.
- 3.60 The emerging District Plan Review, whilst attracting limited weight, further confirms that affordable housing need remains significant and unmet, and that a minimum 30% requirement continues to be both justified by evidence and deliverable. The supporting evidence base, including the SHMA and Topic Paper, identifies a clear and ongoing need for both rented and intermediate affordable housing.
- 3.61 The NPPF and NPPG emphasise the need to significantly boost the supply of homes, including affordable homes, and confirm that meeting affordable housing need is a central component of achieving sustainable development. This is further reinforced by the December 2025 Written Ministerial Statement and draft NPPF, which identify the shortage of affordable housing as a key element of the national housing crisis and signal a clear direction of travel towards strengthening delivery.
- 3.62 The Council's inability to demonstrate a five year housing land supply is a critical material consideration. In these circumstances, paragraph 11d(ii) of the NPPF is engaged and requires particular regard to be had to the delivery of affordable housing, further elevating its importance in decision making.
- 3.63 Taken together, the Development Plan, emerging policy, national policy, and corporate objectives all point to a single, consistent conclusion that the delivery of affordable housing is a priority objective. In this context, it is important to recognise that affordable housing is not simply a component of general housing supply, but a distinct policy objective directed at addressing a specific and acute form of need.
- 3.64 Accordingly, proposals which deliver policy compliant levels of affordable housing, particularly in circumstances where there is a clear shortfall and an absence of a five year housing land supply, make a significant and necessary contribution towards meeting both local and national objectives, and this should be properly reflected in the overall planning assessment.

4. Affordable Housing Needs

Introduction

- 4.1 This section explores the affordable housing needs identified in the adopted Development Plan and its associated evidence base, as well as more recent assessments of affordable housing need in order to provide a comprehensive understanding of formally identified affordable housing needs across the District.
- 4.2 In addition to formal Local Housing Need Assessments, this section examines other indicators of affordable housing need such as the number of households on the Housing Register, households housed in temporary accommodation and homelessness rates. These real-world metrics offer additional insights and perspective on the pressing need for affordable housing in Mid Sussex.

Adopted Development Plan

- 4.3 The adopted Development Plan does not define a numerical target for the provision of affordable homes. Instead, the adopted District Plan seeks 30% affordable housing provision from qualifying development.
- 4.4 The affordable housing policies in the District Plan are underpinned by the Mid Sussex Housing and Economic Development Needs Assessment published in 2015 (2015 HEDNA), drawing upon the Northern West Sussex Affordable Housing Needs Update Report published in 2014 (2014 AHNU).
- 4.5 Both these documents are significantly outdated and pre-date the broadened Annex 2 definition of affordable housing introduced in the 2018 NPPF (and retained in the December 2024 NPPF), which expanded the scope of affordable homeownership tenures.
- 4.6 Accordingly, the District Plan evidence base does not reflect national policy or current affordable housing needs and carries limited weight in the determination of the appeal proposals.

Emerging Development Plan

- 4.7 The Council has produced two Strategic Housing Market Assessments (SHMA) in recent years to inform the emerging Development Plan.
- 4.8 The first SHMA was published in October 2021 (2021 SHMA) (**CD14.3**) and identified the following affordable housing needs over the 17 year period from 2021/22 to 2037/38:
- Table 12.1 (pages 160-161) identifies a net need for 470 affordable/social rented homes per annum across Mid Sussex, equivalent to 7,990 net rented affordable homes over the 17 year period.

- Table 12.1 (pages 160-161) identifies a net need for 455 affordable homeownership homes per annum across Mid Sussex, equivalent to 7,735 net affordable homeownership homes over the 17 year period.
- 4.9 As such, the 2021 SHMA identifies a total net need for 925 net affordable dwellings per annum across Mid Sussex, equivalent to 15,725 affordable dwellings over the 17 year period.
- 4.10 An update was published in 2024 (2024 SHMA) (**CD14.4**), which revises and updates the findings of the 2021 assessment. It identifies the following affordable housing needs over the 19 year period from 2021/22 to 2039/40:
- Table 3.4 (page 14) identifies a net need for 383 affordable/social rented homes per annum across Mid Sussex, equivalent to 7,277 net rented affordable homes over the 19 year period.
 - Table 3.7 (page 17) identifies a net need for 311 affordable homeownership homes per annum across Mid Sussex, equivalent to 5,909 net affordable homeownership homes over the 19 year period.
- 4.11 As such, the 2024 SHMA identifies a total net need for 694 net affordable dwellings per annum across Mid Sussex, equivalent to 13,186 affordable dwellings over the 19 year period.
- 4.12 Whilst there has been a reduction in the annual affordable housing need identified between the two assessments, this is partly a function of the extended plan period in the 2024 SHMA, which redistributes need over a longer timeframe. As a result, the lower annual figure should be understood, in part, as a consequence of this extended period, alongside the use of updated data inputs, rather than representing a directly comparable reduction in need.
- 4.13 In particular, the 2024 SHMA extends the assessment period to 2039/40 and therefore spreads identified need over a longer duration than the 17 year period assessed in 2021. The updated assessment also draws on more recent evidence, including 2021 Census data and updated information on house prices, rents, and incomes, which influences the calculation of affordable housing need.
- 4.14 The total scale of need remains substantial in both assessments, with 15,725 affordable homes identified in the 2021 SHMA compared to 13,186 in the 2024 update. When considered in the context of the longer plan period, this reduction in overall quantum is relatively modest, indicating that the overall level of need remains significant.
- 4.15 The 2024 SHMA identifies some improvement in affordability indicators compared to the earlier assessment. However, the level of identified need remains high in absolute terms, and the updated figure should be understood in the context of refreshed evidence and an extended timeframe, rather than as a fundamental change in the scale of affordable housing required across the District.

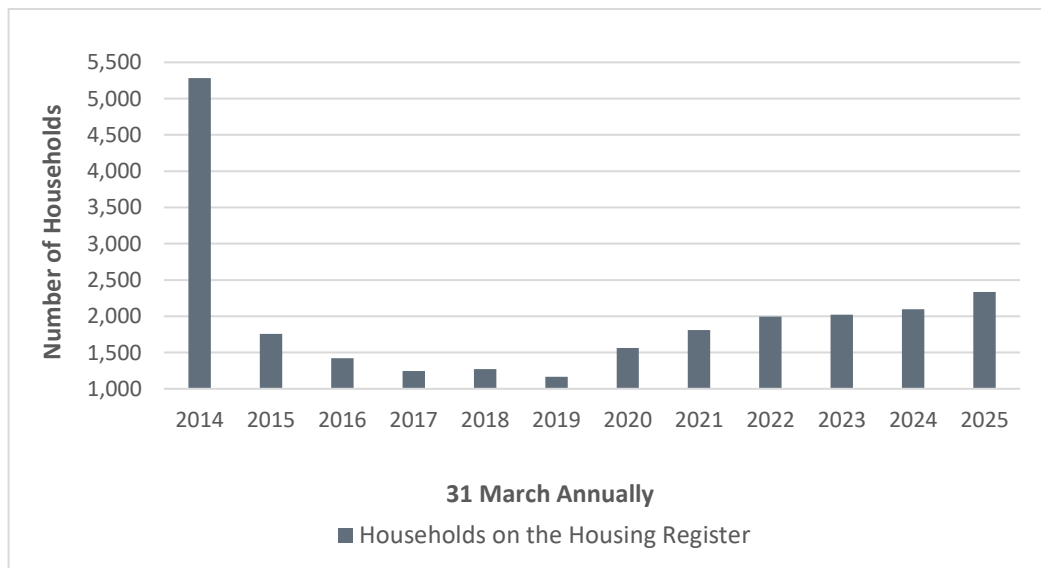
Indicators of Affordable Housing Need

- 4.16 Key indicators like the number of households on the Council’s Housing Register, homelessness rates and households housed in temporary accommodation all serve as crucial markers of current affordable housing need in the District.
- 4.17 The data in this section has been obtained from Ministry of Housing, Communities & Local Government (MHCLG) published statistics and incorporates data provided in the Council’s FOI response (**Appendix AG1**).

Housing Register

- 4.18 On 31 March 2025 there were **2,333 households** on the Council’s Housing Register. This represents an 11% increase from the previous year where the figure stood at 2,097 households. It is notable that there has been a 29% increase in the number of households on the Council’s Housing register since the start of the 2021/2024 SHMA periods in 2021.
- 4.19 The appeal site is mostly located within Ansty and Staplefield Civil Parish and partially within Cuckfield Civil Parish, both of which adjoin Haywards Heath Civil Parish.
- 4.20 The Council’s FOI response indicates (**Appendix AG1**) that on 23 March 2026 three households specified a preference to live in Ansty and Staplefield Civil Parish, 38 households specified a preference to live in Cuckfield Civil Parish, and 515 households specified a preference to live in Haywards Heath Civil Parish.
- 4.21 Figure 4.1 below illustrates the trend in the number of households on the Housing Register since the start of the District Plan period in 2014.

Figure 4.1: Number of Households on the Housing Register, 31 March 2014 to 31 March 2025



Source: MHCLG Open Data.

- 4.22 The Localism Act 2011, which came into force in 2012, gave local authorities the power to set their own qualification criteria determining who may or may not go onto the housing waiting list. Previously, local authorities were only able to exclude from their waiting list people deemed guilty of serious unacceptable behaviour. The MHCLG data set acknowledges that *“The Localism Act 2011, has contributed to a decrease in the size of waiting lists, as it allowed local authorities to set their own qualification criteria”*.
- 4.23 Following the changes brought about by the Localism Act, Mid Sussex Council published a revised Housing Allocations Scheme in 2014 which received further revisions in 2015, 2016, 2017, 2019 and 2025. It is notable that drops in the number of households on the Housing Register correspond with changes made in 2014. The Council’s allocation scheme allows for applicants who have not bid for 12 months to be removed. Irrespective of this the Housing Register has steadily increased from 2019 onwards.
- 4.24 It is however important not to lose sight of the fact that each of the 2,333 households on the Council’s Housing Register are real people in need of an affordable home *now*. In an appeal decision at Oxford Brookes University Campus at Wheatley, (**CD14.2, p74, [13.101]**) the Inspector asserted at paragraph 13.101³ of his report that in the context of a lengthy housing register of 2,421 households:

“It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses” (emphasis added).

Waiting Times

- 4.25 The Council’s Freedom of Information response (**Appendix AG1**) shows that successful applicants for affordable housing face lengthy waits for an affordable home in Mid Sussex.
- 4.26 Table 4.1 illustrates that, across all property sizes, applicants can face exceptionally long waits for an affordable home, particularly for smaller dwellings. While average waits may appear modest, the maximum wait times reveal the extent of unmet need and constrained supply.
- 4.27 For example, some applicants seeking a 2-bedroom property have waited up to 13 years, while of those seeking a 1-bedroom home some have waited over 9 years. These figures highlight a significant shortfall in affordable housing provision in Mid Sussex and underline the pressing need to increase delivery, particularly of smaller affordable homes.

³ Endorsed by the Secretary of State at paragraph 35 of the decision.

Table 4.1: Housing Register Average Waiting Times, 1 April 2024 to 31 March 2025

Type of affordable property	No. of Lets	Minimum Wait	Maximum Wait	Average Wait
1-bed affordable property	156	44 days (0.12 years)	3,576 days (9.80 years)	396 days (1.08 years)
2-bed affordable property	202	26 days (0.07 years)	4,757 days (13.03 years)	319 days (0.87 years)
3-bed affordable property	73	32 days (0.09 years)	1,810 days (4.96 years)	679 days (1.86 years)
4+ bed affordable property	8	228 days (0.62 years)	1,824 days (5.00 years)	767 days (2.10 years)

Source: Freedom of Information response

- 4.28 The disparity between average and maximum waiting times also suggests that many households are being left in unsuitable or unstable accommodation for extended periods, particularly those requiring larger properties. This is likely to include families with children, overcrowded households, and those with specific housing needs.
- 4.29 The limited number of lettings for 3 and 4+ bedroom homes, at just 73 and 8 respectively over the monitoring period, points to a clear and acute shortage of larger affordable homes within Mid Sussex. This constrained supply, when considered alongside comparatively long average waiting times of 1.9 and 2.1 years, indicates that families requiring larger accommodation face particular barriers in accessing suitable housing.
- 4.30 The data therefore highlights not only an overall shortfall in provision, but also an imbalance in the size and type of affordable homes being delivered. Addressing this imbalance will be important to ensure that the needs of larger households, including families and those experiencing overcrowding, can be met more effectively.

Lettings

- 4.31 The appeal site is mostly located within Ansty and Staplefield Civil Parish and partially within Cuckfield Civil Parish, both of which adjoin Haywards Heath Civil Parish.
- 4.32 Table 4.2 below sets out the number of affordable housing lettings in these areas over the 2024/25 monitoring period, providing an indication of the availability and turnover of affordable homes locally. According to the Council's FOI response, the Council's system does not record the total number of bids, meaning the data relates solely to supply and does not capture the full extent of need for affordable housing in these locations.

Table 4.2: No. of Affordable Properties Let, April 2024 to March 2025

Type of affordable property	Ansty and Staplefield Civil Parish	Cuckfield Civil Parish	Haywards Heath Civil Parish
	No. of Properties Let	No. of Properties Let	No. of Properties Let
1-bed property	2	4	22
2-bed property	0	2	29
3-bed property	0	0	16
4+ bed property	0	0	0
Totals	2	6	67

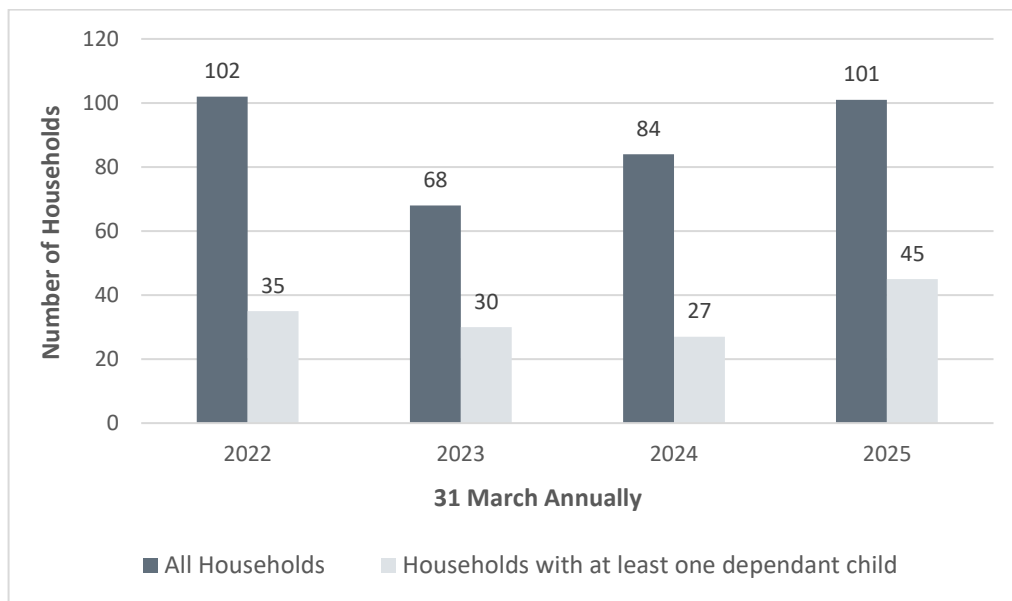
Source: Freedom of Information response

- 4.33 Table 4.2 demonstrates that between 1 April 2024 and 31 March 2025, affordable housing lettings in the immediate local area have been extremely limited. In Ansty and Staplefield Civil Parish, just two properties were let over the period, both comprising 1 bedroom homes. Similarly, in Cuckfield Civil Parish only six properties were let, comprising four 1 bedroom and two 2 bedroom dwellings, with no 3 bedroom or larger homes becoming available.
- 4.34 By comparison, Haywards Heath Civil Parish recorded a higher level of activity, with 67 lettings over the same period. However, even in this larger settlement, provision is still skewed towards smaller units, with 1 and 2 bedroom homes accounting for the majority of lettings and only 16 3 bedroom properties delivered, alongside no 4+ bedroom homes. This indicates that while opportunities to access affordable housing are somewhat greater in Haywards Heath, the supply of family sized accommodation remains limited across the wider area.
- 4.35 Overall, the very low level of turnover in the rural parishes, combined with the constrained supply of larger homes across all three areas, demonstrates a highly restricted affordable housing market, with limited opportunities for households to secure suitable accommodation locally.

Temporary Accommodation

- 4.36 Temporary accommodation is intended to provide an immediate, short-term housing solution for individuals and families facing homelessness or urgent housing needs.
- 4.37 Figure 4.2 below shows the total number of households and households with children within temporary accommodation in the District between 2022 (first published) and 2025. It highlights that **on 31 March 2025 there were 101 households in temporary accommodation**, 45% of which had at least one dependent child. On 31 March 2025 there were 89 children housed in temporary accommodation by the Council.

Figure 4.2: Households in temporary accommodation, 31 March 2022 to 31 March 2025



Source: MHCLG Open Data.

- 4.38 MHCLG data indicates that the Council spent **£3,298,000 on temporary accommodation** in the 2024/25 financial year, 100% of which was spent on 'Any other type of temporary accommodation (including private landlord and not known)'. This represents a 35% increase from the previous year (2023/24) where the figure stood at £2,436,000.
- 4.39 As demonstrated by Table 4.3 below just 36% of households on 31 March 2025 were housed in Local authority or Housing Association stock indicating significant taxpayer spend on private sector solutions. Indeed, 22% of households on 31 March 2025 were housed in bed and breakfast hotels (including shared annexes) and 40% were housed in nightly paid, privately managed accommodation (self-contained).

Table 4.3: Number households in temporary accommodation by accommodation type, 31 March 2025

Accommodation Type	Number of Households	% of Total
Bed and breakfast hotels (including shared annexes)	22	22%
Nightly paid, privately managed accommodation, self-contained	40	40%
Hostels (including reception centres, emergency units and refuges)	0	0%
Leased Private sector accommodation	0	0%
Local authority or Housing association stock	36	36%
Any other type of temporary accommodation	3	3%
Total	101	100%

Source: MHCLG Open Data.

*Figures may not sum due to rounding.

4.40 In respect of challenges the Council faces to minimise and improve the use of temporary accommodation the Homelessness and Rough Sleeping Strategy (**CD14.6**) make clear that the Lack of affordable housing in both the private and social rented sector is a key factor. It goes on to state that:

“The costs and challenges associated with accessing the private rented sector limit our ability to move households out of temporary accommodation into a home in this sector. There is also insufficient social housing to meet the demand and this limits our ability to move households into a home with a Registered Social Landlord.”

4.41 In this context it is also important to note that a significant number of households from other local authority areas are placed in temporary accommodation within the District, as shown in Table 4.4.

Table 4.4: Households Placed in Temporary Accommodation within the Local Authority Area by Other Councils, 31 March 2024 and 31 March 2025

Date	Total Households
31 March 2024	85
31 March 2025	106

Source: Freedom of Information response

4.42 Table 4.4 indicates that local provision is being used to meet wider housing needs beyond the District’s own resident households, which may place additional pressure on available accommodation and further constrain the ability to meet local need. This is especially relevant given that of the 101 households placed in TA on 31 March 2025, 51% (52 households) were housed outside of the Mid Sussex District Council area.

4.43 The above evidence underscores the pressing need for an increase in rented affordable housing stock to reduce dependency on costly private sector accommodations and provide more stable and suitable housing solutions for households in temporary accommodation. Such an increase would not only alleviate financial pressures on public resources but also offer vulnerable households a greater sense of security and community stability, contributing to improved long-term social and economic outcomes.

Homelessness

4.44 Homelessness is a critical social challenge, reflecting broader issues of housing affordability, availability, and support for vulnerable populations. Authorities have a statutory duty under the Homelessness Reduction Act 2017 to prevent and relieve homelessness:

- The **Prevention Duty** places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homeless. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

- The **Relief Duty** requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

4.45 As demonstrated by Table 4.5 below, in the 12 months between 1 April 2024 and 31 March 2025, the Council accepted 418 households in need of a homelessness prevention duty, and a further 128 households in need of a relief duty from the Council.

Table 4.5: Number of households owed a homelessness duty by reason for loss of last settled home, 1 April 2024 to 31 March 2025

Reason for loss of last settled home	Prevention duty		Relief duty	
	No. Households	%	No. Households	%
Family or friends no longer willing or able to accommodate	58	14%	34	26%
End of private rented tenancy - assured shorthold	122	29%	9	7%
Domestic abuse	54	13%	31	24%
Non-violent relationship breakdown with partner	41	10%	17	13%
End of social rented tenancy	66	16%	11	8%
Eviction from supported housing	3	1%	8	6%
End of private rented tenancy - not assured shorthold	10	2%	1	1%
Other violence or harassment	22	5%	7	5%
Left institution with no accommodation available	3	1%	3	2%
Required to leave accommodation provided by Home Office as asylum support	0	0%	0	0%
Home no longer suitable - disability / ill health	22	5%	0	0%
Other reasons / not known	17	4%	7	5%
Totals	418	100%	128	100%

Source: MHCLG Open Data.

*Figures may not sum due to rounding.

4.46 The data highlights distinct patterns in the reasons for the loss of settled homes among households receiving Prevention Duty and Relief Duty support. The most common cause under Prevention Duty was the end of private rented tenancies, accounting for a combined 31% of cases when assured and non-assured shorthold tenancies are considered together. This suggests that insecurity in the private rented sector remains a significant driver of potential homelessness across Mid Sussex and reflects wider trends in affordability and tenancy instability.

4.47 Under Relief Duty, the data shifts towards crisis-driven causes, with family or friends no longer accommodating becoming the primary factor in Mid Sussex (26%). Domestic abuse also emerges as a significant driver (24%), demonstrating the acute need for emergency housing and support services. The end of private rented sector tenancies still

contributes to relief cases (8% combined), although to a lesser extent than in prevention cases.

- 4.48 In this context, it is relevant to note that the Council’s Homelessness and Rough Sleeping Strategy (CD14.6) makes clear in the Foreword (page 2) that *“Homelessness, in all its forms, can have a significant detrimental impact on many areas of life, including undermining educational achievement and acting as a barrier for those seeking and keeping employment. It also puts extra demand on health services.”*
- 4.49 These findings collectively highlight the need for tailored strategies that address both the predictable risks within the private rental sector and the immediate crises stemming from personal or social breakdowns. They also reinforce the critical importance of significantly increasing the supply of affordable housing, in order to provide secure, long-term options for those at risk of homelessness and to reduce reliance on temporary or informal living arrangements.

Conclusions

- 4.50 The evidence demonstrates a clear and substantial affordable housing need across Mid Sussex. Whilst the adopted Development Plan seeks 30% affordable housing provision from qualifying developments, the evidence underpinning that policy is now dated and does not reflect either current national policy or the scale and nature of affordable housing needs identified in more recent assessments.
- 4.51 The Council’s more recent SHMA evidence confirms that affordable housing need remains significant. The 2021 SHMA identified a net need for 925 affordable homes per annum, whilst the 2024 SHMA identifies a net need for 694 affordable homes per annum. Although the latter figure is lower, this must be understood in the context of updated data inputs and the extended plan period. In either case, the level of identified need remains substantial in absolute terms, with the 2024 SHMA still identifying a requirement for 13,186 affordable homes over the plan period.
- 4.52 The real world indicators examined in this section reinforce that conclusion. There are currently 2,333 households on the Council’s Housing Register, representing a 29% increase since the start of the 2021/2024 SHMA period in 2021. This increase has occurred notwithstanding changes to qualification criteria and allocation arrangements, indicating that need is both significant and growing. Waiting time data also points to substantial unmet need and constrained supply, with some households waiting over 9 years for a 1 bedroom affordable home and up to 13 years for a 2 bedroom home. The very limited number of lettings for 3 and 4+ bedroom homes further indicates that larger households face particular barriers in accessing suitable affordable accommodation.
- 4.53 The local lettings data for Ansty and Staplefield, Cuckfield and Haywards Heath provides a similarly clear picture of constrained supply. In the rural parishes, turnover is extremely limited, with only eight affordable homes let across Ansty and Staplefield and Cuckfield combined over the 2024/25 monitoring period, and none of these being 3 bedroom or larger homes. Even in Haywards Heath, where turnover is higher, the supply of family sized affordable housing remains limited. This demonstrates that opportunities for households to secure suitable affordable housing locally are severely restricted.

- 4.54 The evidence on temporary accommodation and homelessness adds further weight to this position. On 31 March 2025, 101 households were housed in temporary accommodation by the Council, including households with dependent children and 89 children overall, whilst the Council spent £3,298,000 on temporary accommodation in 2024/25. A substantial proportion of households are being accommodated in bed and breakfast hotels or privately managed nightly paid accommodation, demonstrating both the human and financial consequences of an inadequate supply of affordable rented homes. At the same time, the Council accepted 418 households for a homelessness prevention duty and 128 for a relief duty in the most recent year, with private rented sector insecurity, family breakdown and domestic abuse all acting as significant drivers.
- 4.55 Taken together, the evidence provides a compelling and consistent picture of acute affordable housing need across Mid Sussex. This need is reflected not only in the formal SHMA evidence, but also in the increasing Housing Register, lengthy waiting times, limited local lettings, reliance on temporary accommodation and sustained homelessness pressures. The scale, persistence and breadth of these indicators demonstrate that there is a clear and pressing need to increase the supply of affordable housing across the District, including both rented affordable homes and affordable homeownership products.

5. Past Affordable Housing Delivery

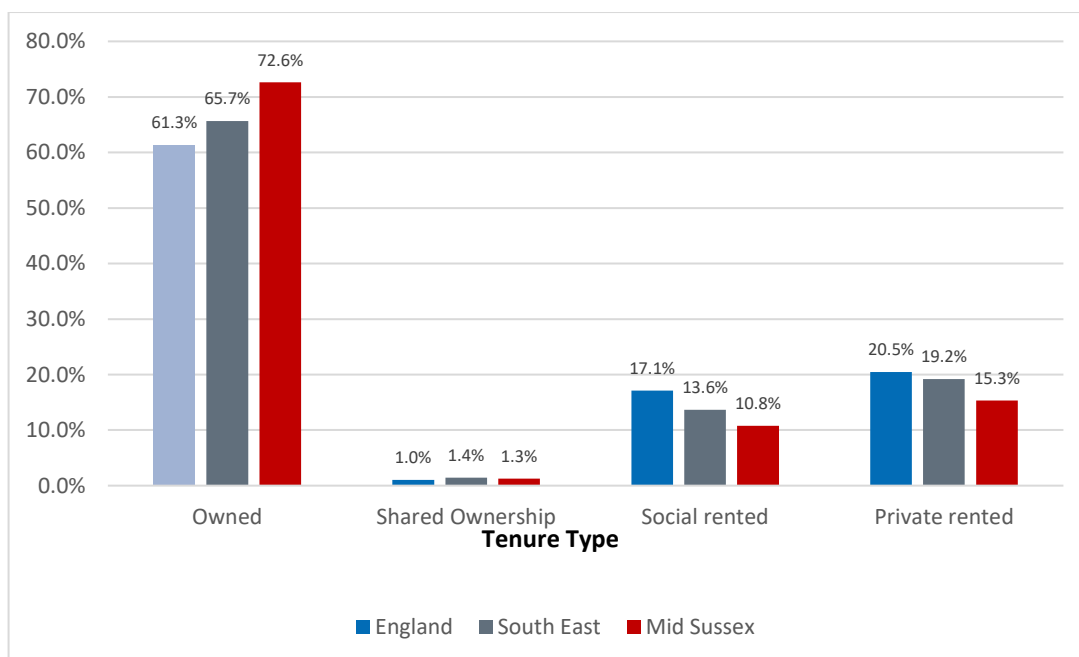
Introduction

- 5.1 This section reviews past rates of affordable housing delivery across Mid Sussex, revealing significant and persistent shortfalls against identified needs. These findings underscore an urgent and pressing need for a substantial increase in affordable housing provision throughout the District.
- 5.2 The analysis in this section is underpinned by the data tables provided at **Appendix AG5**, which have been compiled from Ministry of Housing, Communities & Local Government (MHCLG) published statistics and Census data produced by the Office for National Statistics (ONS). It also incorporates data provided in the Council's FOI response (**Appendix AG1**).

Available Stock by Tenure

- 5.3 The composition of the existing housing stock provides essential context for understanding past delivery patterns and assessing the scale of affordable housing need.
- 5.4 Figure 5.1 illustrates the tenure profile of Mid Sussex in 2021, benchmarked against the South East and England as a whole. It highlights the District's particularly high rate of home ownership and comparatively low proportions of affordable housing tenures.

Figure 5.1: Tenure of Households in Mid Sussex Compared to the South East and England, 2021



Source: 2021 Census data (TS054)

*'Lives rent free' has been omitted from the figures due to its negligible presence, representing 0.1% or less of households at the local, regional, and national levels.

- 5.5 As of the 2021 Census, 72.6% of households in Mid Sussex owned their home. This is higher than the regional (65.7%) and national (61.3%) averages and reflects a tenure profile that is **heavily weighted towards market home ownership**, with affordable tenures occupying only a marginal share of the market.
- 5.6 Affordable housing tenures remain noticeably underrepresented across Mid Sussex. Social rented housing made up only 10.8% of households in 2021. This is lower than the South East figure of 13.6% and still well below the national level of 17.1%. Shared Ownership was even more limited, comprising just 1.3% of households, which is broadly in line with the regional figure of 1.4% and the national figure of 1.0%.
- 5.7 These figures confirm the very limited role that affordable housing tenures currently play in the local housing market. This imbalance underscores the critical need to increase the supply of affordable housing in order to create a more equitable and diverse tenure mix, in line with the NPPF's objective to create mixed and balanced communities (paragraph 64).

Additions to Affordable Housing Stock

- 5.8 Since the start of the District Plan period in 2014/15 and 2024/25 the Council has added a total of 2,545 gross affordable dwellings to its housing stock, equivalent to just 231 new dwellings per annum. When compared with the total net housing completions figure of 9,761 dwellings, gross affordable housing delivery has represented 26% of total additions.
- 5.9 Whilst the gross data from MHCLG accounts for new build affordable dwellings and acquisitions from the private sector, it does not account for any reductions in affordable housing stock due to demolitions or Right to Buy sales from Council and/or RP affordable housing portfolios. Table 5.1 below illustrates the effect of Right to Buy sales on gross additions in Mid Sussex.

Table 5.1: Net Additions to Affordable Housing Stock, 2014/15 to 2024/25

Monitoring Period	Gross Additions	Right to Buy Sales	Net Additions
2014/15	229	3	226
2015/16	79	7	72
2016/17	82	4	78
2017/18	178	1	177
2018/19	73	4	69
2019/20	139	3	136
2020/21	197	1	196
2021/22	398	2	396
2022/23	524	2	522
2023/24	338	0	338
2024/25	308	1	307
Totals	2,545	28	2,517
Avg. Pa.	231	3	229

Source: MHCLG Open Data

5.10 The data highlights that over the 11-year period there has been a total of 28 losses to affordable housing stock through the Right to Buy, which represents 1.1% of gross additions. When the effect of the Right to Buy is taken into account the Council has delivered 2,517 net affordable homes since 2014/15, equivalent to 229 dwellings per annum. This remains broadly at 26% of total net housing additions. This figure is likely to fall even further if demolitions were taken into account⁴.

Net Additions vs Net Needs

5.11 When comparison is drawn between the affordable housing need target identified in the 2021 SHMA of 925 affordable dwellings per annum, a cumulative shortfall of 2,137 net affordable dwellings has accrued over the four year period between 2021/22 and 2024/25. In other words, just 42% of identified need was met over the period, evidencing a substantial and persistent under delivery of affordable housing.

5.12 This position is further reinforced by the 2024 SHMA, which updates the evidence base and identifies a lower annual need of 694 affordable homes per annum. This reduction reflects, in part, the extension of the plan period and the redistribution of need over a longer timeframe, alongside the use of updated data inputs. Table 5.2 calculates the current cumulative shortfall against the affordable housing needs identified in the 2024 SHMA.

Table 5.2: Net Additions to Affordable Housing Stock Compared to Affordable Needs identified in the 2024 SHMA, 2021/22 to 2024/25

Monitoring Period	Net Additions	Net Need	Annual Shortfall	Cumulative Shortfall	Additions as a % of Needs
2021/22	396	694	-298	-298	57%
2022/23	522	694	-172	-470	75%
2023/24	338	694	-356	-826	49%
2024/25	307	694	-387	-1,213	44%
Total	1,563	2,776		-1,213	56%
Avg. Pa	391	694		-303	

Source: MHCLG Open Data; and 2024 SHMA.

5.13 Table 5.2 demonstrates that in the four-year period since the start of the 2024 SHMA period in 2021/22, just 1,563 net affordable dwellings have been delivered across Mid Sussex, meeting only 56% of the identified need for 2,776 affordable homes over the period. This equates to an average of just 391 net additions per annum compared to an identified need for 694, resulting in an average annual shortfall of more than 300 homes. Put simply, around 44% of identified affordable housing need has gone unmet over this period.

5.14 In this context, it is pertinent to highlight that the Council’s Homelessness and Rough Sleeping Strategy (CD14.6) candidly states on page 15 that “Expectations of accessing

⁴ MHCLG does not provide affordable housing demolition data at local authority level.

social housing are not realistic relative to the actual supply and demand of social housing locally.” This reinforces the evidence of a structural imbalance between supply and need, with delivery consistently failing to keep pace with identified need.

Addressing the Shortfall

- 5.15 In my view, the scale of the shortfall, combined with the substantial number of households on the Council’s Housing Register, underscores an urgent and pressing need for affordable housing. The **2,333 households** on the Council’s Housing Register are in need of an affordable home *now*; as are the **89 children** in temporary accommodation.
- 5.16 As such, the aim should be to meet the shortfall in affordable housing provision as soon as possible i.e. over the next five years, in line with the approach set out in the NPPG⁵ for overall housing shortfalls. A summary of SoS and Inspectors’ appeal decisions that support this approach is provided at **Appendix AG6**.
- 5.17 To clear the 1,213 dwelling shortfall accumulated between 2021/22 and 2024/25, the Council would need to deliver 937⁶ net affordable dwellings per annum over the next five years (2025/26 to 2029/30), representing a 35% increase from the annual need of 694 net affordable dwellings identified in the 2024 SHMA. Without a step change in affordable housing delivery this is unlikely to be realised.

Affordable Housing Delivery in Ansty and Staplefield Civil Parish and Cuckfield Civil Parish.

- 5.18 Table 5.3 illustrates the delivery of affordable housing in Ansty and Staplefield Civil Parish over the 11 year period since the start of the District Plan period in 2014/15 and 2024/25.

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⁵ Paragraph: 031 Reference ID: 68-031-20190722

⁶ 1,213 / 5 years = 242.6 + 694 = 936.6

Table 5.3: Gross Additions to Affordable Housing Stock in Ansty and Staplefield Civil Parish, 2014/15 to 2024/25

Monitoring Period	Total Housing Completions (Net)	Gross Additions
2014/15	0	10
2015/16	41	0
2016/17	42	19
2017/18	17	2
2018/19	3	0
2019/20	8	24
2020/21	21	61
2021/22	1	23
2022/23	6	31
2023/24	130	0
2024/25	4	0
Total	273	170
Avg. Pa	25	15

Source: FOI Response

- 5.19 Over this period, there were 273 net housing completions and 170 gross additions to the affordable housing stock. This equates to an average of 25 dwellings per annum, of which 15 dwellings per annum were affordable. Losses to existing stock through the Right to Buy and demolitions are not recorded on a parish basis, and the figures are therefore gross.
- 5.20 Table 5.4 illustrates the delivery of affordable housing in Cuckfield Civil Parish over the 11 year period since the start of the District Plan period in 2014/15 and 2024/25.

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Table 5.4: Gross Additions to Affordable Housing Stock in Cuckfield Civil Parish, 2014/15 to 2024/25

Monitoring Period	Total Housing Completions (Net)	Gross Additions
2014/15	43	17
2015/16	16	10
2016/17	20	0
2017/18	7	0
2018/19	9	0
2019/20	1	0
2020/21	2	0
2021/22	4	0
2022/23	1	0
2023/24	7	0
2024/25	12	4
Total	122	31
Avg. Pa	11	3

Source: FOI Response

- 5.21 Over this period, there were 122 net housing completions and 31 gross additions to the affordable housing stock. This equates to an average of 11 dwellings per annum, of which 3 dwellings per annum were affordable. Affordable housing delivery has been recorded in only three monitoring years with no provision delivered in the remaining eight years of the period. The net level of affordable housing provision is likely to be lower once losses to stock through the Right to Buy and demolitions are taken into account.
- 5.22 Affordable housing delivery in the Parishes should be considered in the context of Housing Register data. The Council's FOI response confirms that three households specified Ansty and Staplefield Civil Parish and 38 households specified Cuckfield Civil Parish as a preferred location and a further 515 households for Haywards Heath Civil Parish.
- 5.23 However, this must be viewed alongside the very limited level of supply, with only two affordable homes let in Ansty and Staplefield and six in Cuckfield in 2024/25. The recorded level of preference is therefore likely to understate Housing Register need in these Parishes, as limited turnover reduces the realistic prospect of securing accommodation.

Conclusions

- 5.24 The evidence demonstrates that affordable housing delivery in Mid Sussex has been consistently and materially below identified levels of need over a sustained period. Since 2014/15, delivery has averaged just 229 net affordable dwellings per annum, representing only around 26% of total housing completions and falling well short of both historic and current assessments of affordable housing need.

- 5.25 When set against the scale of need, this under delivery has resulted in a significant and growing shortfall. Between 2021/22 and 2024/25 alone, a cumulative deficit of 2,137 affordable homes has arisen against the 2021 SHMA need, with only 42% of identified need met. Even under the updated 2024 SHMA, which identifies a lower annual need for 694 dwellings, delivery has met only 56% of need over the same period, leaving a shortfall of 1,213 homes. This confirms that the gap between need and provision remains substantial and persistent.
- 5.26 The shortfall is continuing to increase, and recent delivery has consistently failed to meet annual requirements, with around half of affordable housing need going unmet each year. At the same time, the existing stock profile remains heavily skewed towards owner occupation, with affordable tenures accounting for only a limited proportion of the overall housing stock. This indicates that past delivery has not only been insufficient in scale but has also failed to rebalance the tenure mix in a way that responds to identified needs.
- 5.27 At the local level, the Parish data reinforces this position. In Ansty and Staplefield, 170 affordable dwellings have been delivered, compared to 31 in Cuckfield, with no provision in eight of the eleven monitoring years. In 2024/25, only two affordable homes were let in Ansty and Staplefield and six in Cuckfield. Housing Register data records three households specifying Ansty and Staplefield, 38 specifying Cuckfield and 515 specifying Haywards Heath. The combination of low delivery and limited turnover indicates very constrained access to affordable housing within these Parishes.
- 5.28 The scale of the challenge is such that it cannot be addressed through incremental improvements in delivery. To both meet ongoing annual needs and address the accumulated shortfall, delivery would need to increase to approximately 937 affordable homes per annum over the next five years. This represents a step change from historic delivery rates and highlights the extent to which current provision is falling short of what is required. Without such an increase, the backlog of unmet need will continue to grow.
- 5.29 Taken together, the evidence provides a clear and consistent picture of a housing system that has persistently failed to deliver sufficient affordable housing to meet identified needs at both the District and local level. The sustained under delivery, combined with a growing backlog, limited turnover in rural Parishes and a tenure profile that underrepresents affordable housing, demonstrates that a substantial increase in provision is required. This establishes a strong justification for maximising affordable housing delivery through new development in order to begin to address both the ongoing annual need and the accumulated shortfall across Mid Sussex.

6. Market Conditions

Introduction

- 6.1 The NPPF is clear that all households whose needs are not met by the market (either to rent or to buy) are considered to be in affordable housing need. This section analyses past and current market conditions in both the rental and ownership segments of the market to understand the nature of the housing market in the District.

Private Rental Market

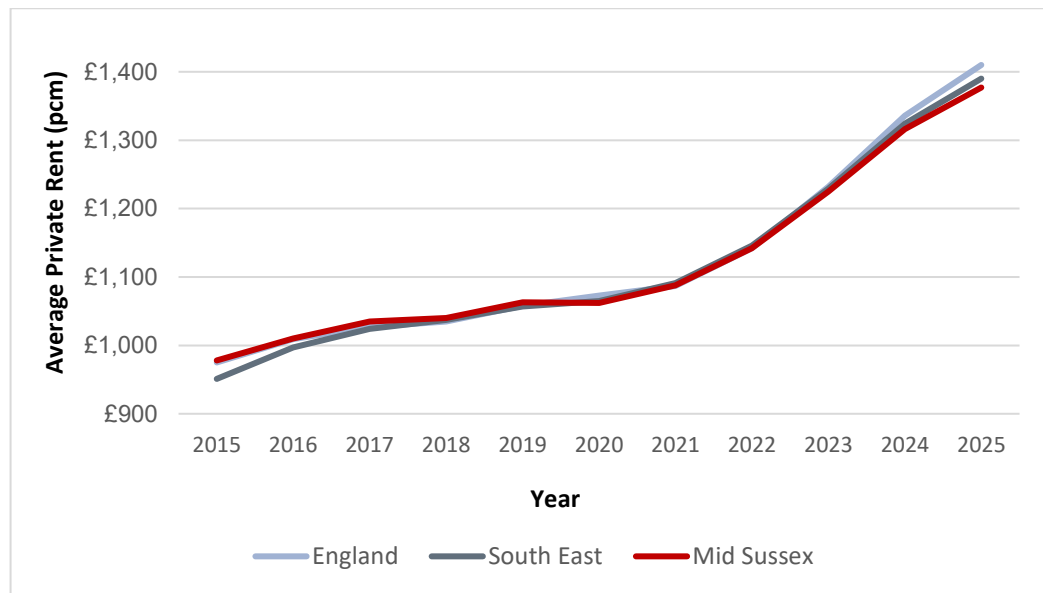
- 6.2 The following analysis relies on the Office for National Statistics (ONS) Price Index of Private Rents first published in 2015⁷. The data includes both existing and new lets, meaning the values shown may not fully reflect costs faced by new tenants in the District.

- 6.3 Figure 6.1 below shows the trends in average private rents across the District with regional and national figures over the 10 year period from 2015 to 2025. This illustrates how overall rental prices have changed in the local market over time relative to wider trends:

- Average private rents in Mid Sussex have increased by around 41% over the period, rising from £978 pcm in 2015 to £1,377 pcm in 2025. This represents a substantial increase and indicates worsening affordability pressures for households over time.
- Although rental growth in Mid Sussex (41%) has been slightly lower than the South East (46%) and England (45%), this still reflects a significant uplift in costs, particularly when considered alongside already relatively high starting values.
- Mid Sussex has remained consistently at, or above, national, and regional averages for much of the period, demonstrating that rental costs have been persistently high in the local market compared to wider benchmarks.
- While the gap has narrowed slightly in recent years, average rents in Mid Sussex remain broadly comparable to the South East and England in 2025, indicating that affordability pressures remain acute rather than easing in relative terms.
- Over the most recent 12 month period, rents in Mid Sussex have increased by 5%, in line with the South East and slightly below the national increase (6%), indicating that affordability pressures are continuing to intensify in the short term as well as over the longer term.

⁷ ONS discontinued the publication of lower quartile and median private rental market statistics in December 2023.

Figure 6.1: Average Private Rents (pcm), 2015 to 2025



Source: ONS Open Data.

- 6.4 The evidence demonstrates a clear and sustained pattern of affordability pressure within Mid Sussex’s private rented sector. While average rents have broadly tracked regional and national trends in percentage terms, this has occurred from an already relatively high base, meaning that costs to households have remained persistently elevated in absolute terms. The 41% increase in rents over the period, alongside a further 5% rise in the most recent year, indicates that affordability pressures are not only long standing but continuing to intensify.
- 6.5 In this context it is unsurprising that one of the ‘Key Findings’ in the Councils Homelessness and Rough Sleeping Strategy (**CD14.6, p.5**) is that *“Landlords and letting agencies remain reluctant to let to households in receipt of benefits. Universal credit is compounding this issue due to concerns about tenant arrears. Upfront costs can equate to over £2,500 and rents are on average £1,255pcm, 27% higher than the Local Housing Allowance. **This leaves the sector largely inaccessible to households on low incomes or in receipt of benefits**”* (emphasis added).
- 6.6 The fact that rents have remained consistently at, or close to, regional and national averages does not suggest relative affordability, but rather reflects the wider structural pressures affecting the South East housing market, within which Mid Sussex forms part of a high cost geography. As a result, a growing proportion of households are likely to be unable to meet their housing needs through the private rented sector, reinforcing the scale of affordable housing need and the importance of maintaining strong and sustained delivery across all affordable tenures.

Homeownership Market

- 6.7 The ONS publishes annual house price and earnings data for affordability ratios at the lower quartile and median levels. The median affordability ratio is a key component in the Standard Method calculation for determining Local Housing Need.

6.8 Lower quartile and median house price data is also produced for Middle Layer Super Output Areas (MSOAs)⁸ by the ONS. The appeal site sits within MSOA Mid Sussex 011 (Haywards Heath South and Cuckfield). Earnings data is not published below local authority level.

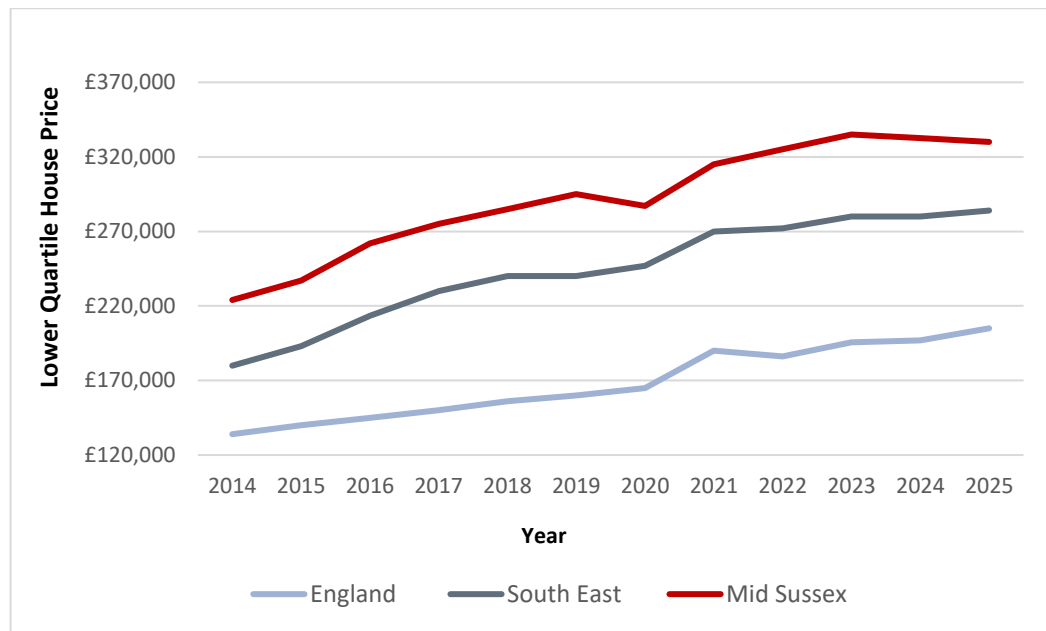
Lower Quartile House Prices

6.9 Figure 6.2 below identifies the following trends in lower quartile house prices, representing entry-level housing costs, across the District since the start of the District Plan period in 2014:

- Lower quartile house prices in Mid Sussex have increased by around 47% over the period, rising from £224,000 in 2014 to £330,000 in 2025. This represents a substantial increase and indicates worsening affordability for households seeking to access home ownership.
- Although price growth in Mid Sussex (47%) has been slightly lower than in the South East (58%) and England (53%), this must be seen in the context of a high starting point, with entry level prices already significantly elevated.
- Mid Sussex has consistently remained more expensive than both the South East and England throughout the period, demonstrating a persistent and pronounced affordability gap in the local housing market.
- By 2025, lower quartile house prices in Mid Sussex (£330,000) are around 16% higher than the South East (£284,000) and approximately 61% higher than England (£204,995), highlighting the extent to which the District is less affordable than wider benchmarks.
- Over the most recent 12 month period, lower quartile prices in Mid Sussex have decreased slightly by around 1%, compared to modest growth nationally (4%) and regionally (1%). This suggests a short term stabilisation in prices, although this does not materially improve affordability given the very high baseline.

⁸ A geographical unit in England and Wales used by the ONS for publishing small-area statistics, typically combining 4-5 Lower Layer SOAs (LSOAs) to cover 5,000-15,000 residents and 2,000-6,000 households.

Figure 6.2: Lower Quartile House Prices, 2014 to 2025

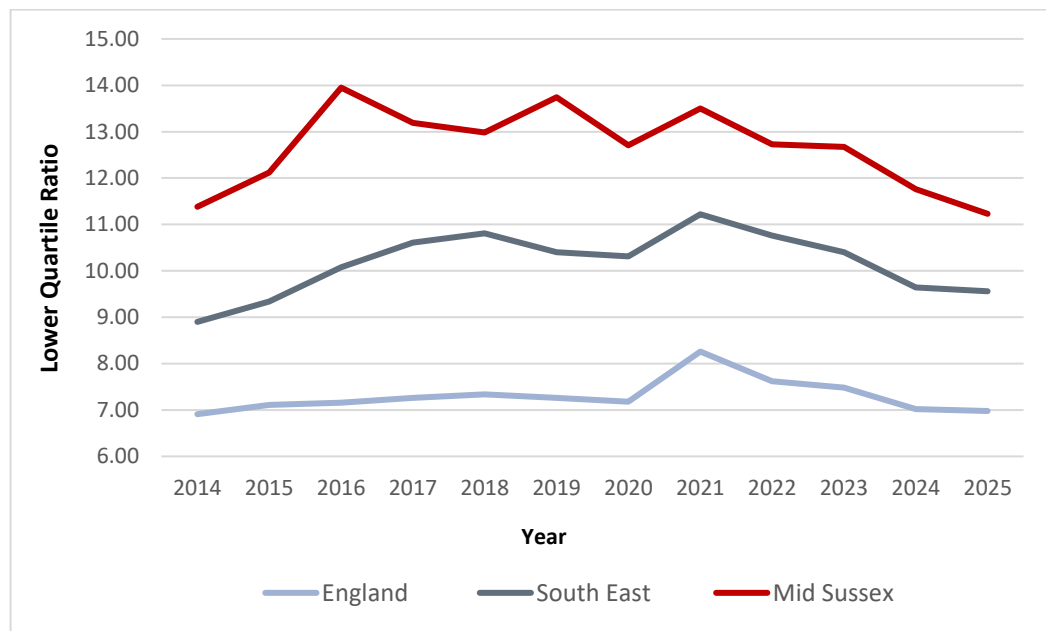


Source: ONS Open Data.

6.10 It is important to consider lower quartile house prices in context of lower quartile incomes. Figure 6.3 below compares the workplace-based lower quartile affordability ratio for Mid Sussex against regional and national averages over the period, highlighting the following trends:

- The lower quartile affordability ratio in Mid Sussex has remained persistently high over the period, decreasing only marginally from 11.38 in 2014 to 11.23 in 2025. This limited change indicates that affordability pressures for entry level households have remained entrenched over time.
- While the ratio in Mid Sussex has decreased slightly overall (around -1%), this contrasts with increases in the South East (7%) and relative stability nationally (1%), suggesting that any improvement locally has been modest and does not materially alter affordability challenges.
- Mid Sussex has consistently recorded significantly higher affordability ratios than both the South East and England throughout the period, demonstrating a sustained and substantial affordability gap.
- By 2025, the affordability ratio in Mid Sussex (11.23) is around 17% higher than the South East (9.56) and approximately 61% higher than England (6.98), highlighting the extent to which access to home ownership is more constrained in the District.
- Over the most recent 12 month period, the ratio in Mid Sussex has reduced by around 5%, compared to a 1% decrease both regionally and nationally. This reflects a short term easing in the relationship between incomes and house prices, although affordability remains stretched in absolute terms.

Figure 6.3: Lower Quartile Workplace-Based Affordability Ratio comparison, 2014 to 2025



Source: ONS Open Data.

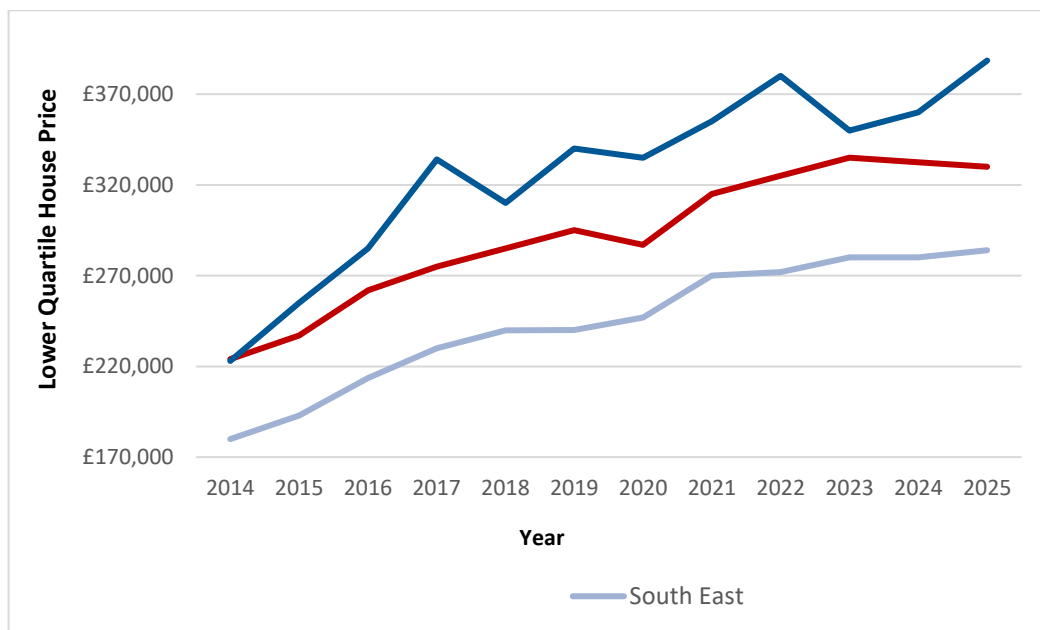
6.11 Figure 6.4 compares lower quartile house prices for the South East and Mid Sussex with those recorded in Haywards Heath South and Cuckfield (MSOA Mid Sussex 011). The data shows that Haywards Heath South and Cuckfield is consistently more unaffordable than the Mid Sussex average. In particular:

- Lower quartile house prices in Haywards Heath South and Cuckfield have increased significantly from £223,010 in 2014 to £388,500 in 2025, representing growth of around 74%. This is substantially higher than the 47% increase recorded across Mid Sussex, indicating a more acute worsening of affordability at the local level.
- The area has been consistently more expensive than the Mid Sussex average throughout the period, with the gap widening over time. This demonstrates that entry level affordability pressures are particularly pronounced in this part of the District.
- By 2025, lower quartile prices in Haywards Heath South and Cuckfield (£388,500) are around 18% higher than the Mid Sussex average (£330,000), highlighting a significant local affordability premium.
- When considered alongside wider benchmarks, this gap is even more pronounced. Lower quartile prices in Mid Sussex already exceed the South East average (£284,000) by around 16%, meaning that prices in Haywards Heath South and Cuckfield are substantially above both regional and national levels.
- Over the most recent 12 month period, prices in Haywards Heath South and Cuckfield have increased by around 7%, in contrast to a slight decrease in Mid

Sussex (-1%). This indicates that affordability pressures are continuing to intensify locally, despite some short term stabilisation at the District level.

- The evidence shows that affordability pressures in Haywards Heath South and Cuckfield are particularly severe and worsening over time, with house prices rising more rapidly than both the District and wider comparators, further constraining access to home ownership for lower income households.

Figure 6.4: Lower Quartile House Prices by MSOA, 2014 to 2025



Source: ONS Open Data.

- 6.12 The combined evidence on lower quartile house prices and affordability ratios demonstrates a sustained and acute affordability challenge for entry level buyers in Mid Sussex. House prices have increased substantially over the period, whilst affordability ratios have remained persistently high, indicating that any changes in earnings have not kept pace with the cost of accessing home ownership.
- 6.13 Lower quartile house prices have risen by 47% since 2014, with values consistently exceeding both regional and national benchmarks, reaching £330,000 in 2025. This is reinforced by affordability ratios remaining above 11 throughout the period, significantly higher than the South East and England. The MSOA level evidence for Haywards Heath South and Cuckfield further intensifies this position, with prices increasing more rapidly at 74% over the same period and reaching £388,500 in 2025, around 18% above the District average. This demonstrates that the most acute affordability pressures are experienced locally, within an already high cost District context. Although there has been some short term fluctuation, including a modest reduction in prices and ratios in the most recent year, these changes do not materially alter the overall trajectory or improve accessibility to home ownership.
- 6.14 Taken together, the evidence shows a clear and widening disconnect between entry level house prices and local incomes. The persistence of high affordability ratios,

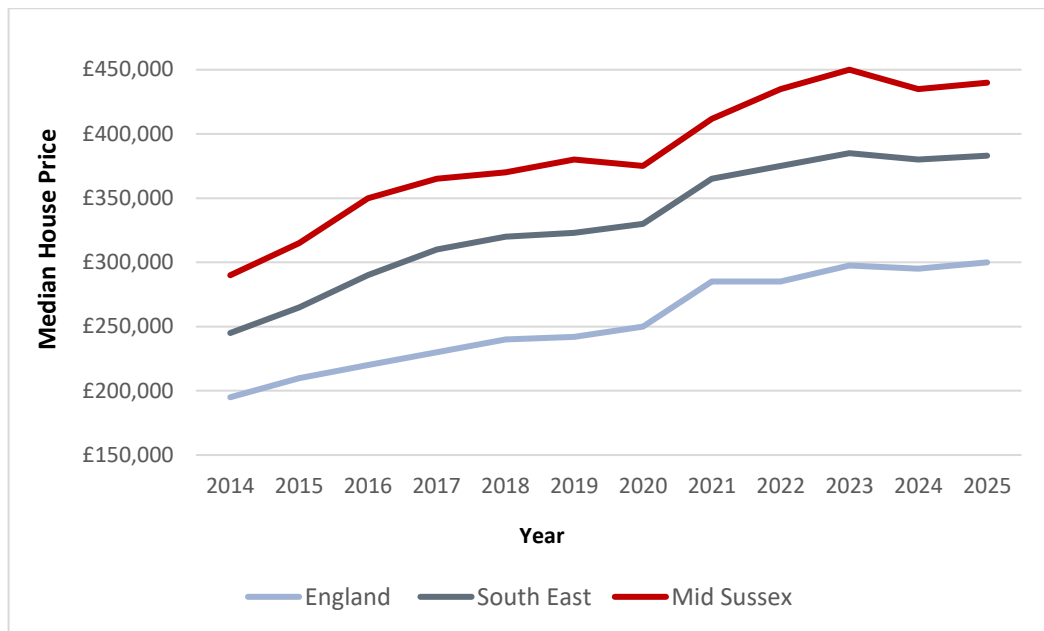
combined with substantial price growth at both District and local levels, indicates that market housing is increasingly inaccessible to lower income households. This points to a structural failure of the market to provide realistic routes into home ownership and reinforces the scale and urgency of affordable housing need across Mid Sussex.

Median House Prices

6.15 Figure 6.5 below shows trends in median house prices, representing the midpoint of the housing market, across the District since the start of the District Plan period in 2014:

- Median house prices in Mid Sussex have increased by around 52% over the period, rising from £290,000 in 2014 to £440,000 in 2025. This represents a substantial increase and indicates a significant worsening of affordability across the wider housing market, not just at the lower end.
- Although growth in Mid Sussex (52%) is slightly below that recorded in the South East (56%) and England (54%), this reflects a high starting point, with prices already well above national levels at the beginning of the period.
- Mid Sussex has consistently remained more expensive than both the South East and England throughout the period, demonstrating a sustained and structural affordability gap in the local housing market.
- By 2025, median house prices in Mid Sussex (£440,000) are around 15% higher than the South East (£383,000) and approximately 47% higher than England (£300,000), highlighting the extent to which the District is less affordable than wider benchmarks.
- Over the most recent 12 month period, median prices in Mid Sussex have increased by around 1%, broadly in line with regional growth (1%) but slightly below the national increase (2%), indicating that affordability pressures continue to persist in the short term.

Figure 6.5: Median House Prices, 2014 to 2025

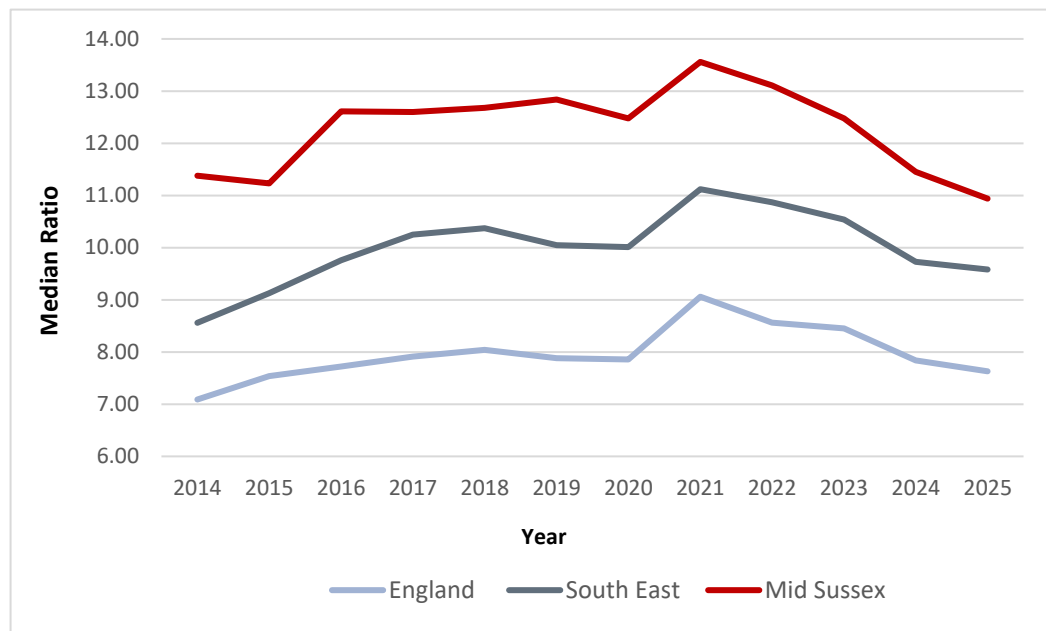


Source: ONS Open Data.

6.16 Analysing the affordability of median house prices requires placing them in the context of median incomes. Figure 6.6 below illustrates the workplace-based median affordability ratio for Mid Sussex compared to regional and national averages over the period highlighting the following trends:

- The median affordability ratio in Mid Sussex has remained persistently high over the period, decreasing slightly from 11.38 in 2014 to 10.94 in 2025. This modest reduction of around -4% indicates that affordability pressures have remained entrenched despite some recent improvement.
- In contrast, affordability ratios have increased over the same period in the South East (12%) and England (8%), meaning that relative to wider trends, Mid Sussex has seen a limited easing. However, this does not materially improve overall affordability given the high baseline.
- Mid Sussex has consistently recorded significantly higher affordability ratios than both the South East and England throughout the period, demonstrating a sustained and substantial affordability gap in the local housing market.
- By 2025, the median affordability ratio in Mid Sussex (10.94) is around 14% higher than the South East (9.58) and approximately 43% higher than England (7.63), highlighting the extent to which access to home ownership remains more constrained in the District.
- Over the most recent 12 month period, the ratio in Mid Sussex has reduced by around 5%, compared to decreases of 2% regionally and 3% nationally. This suggests a short term improvement in the relationship between incomes and house prices, although affordability remains stretched in absolute terms.

Figure 6.6: Median Workplace-Based Affordability Ratio comparison, 2014 to 2025



Source: ONS Open Data.

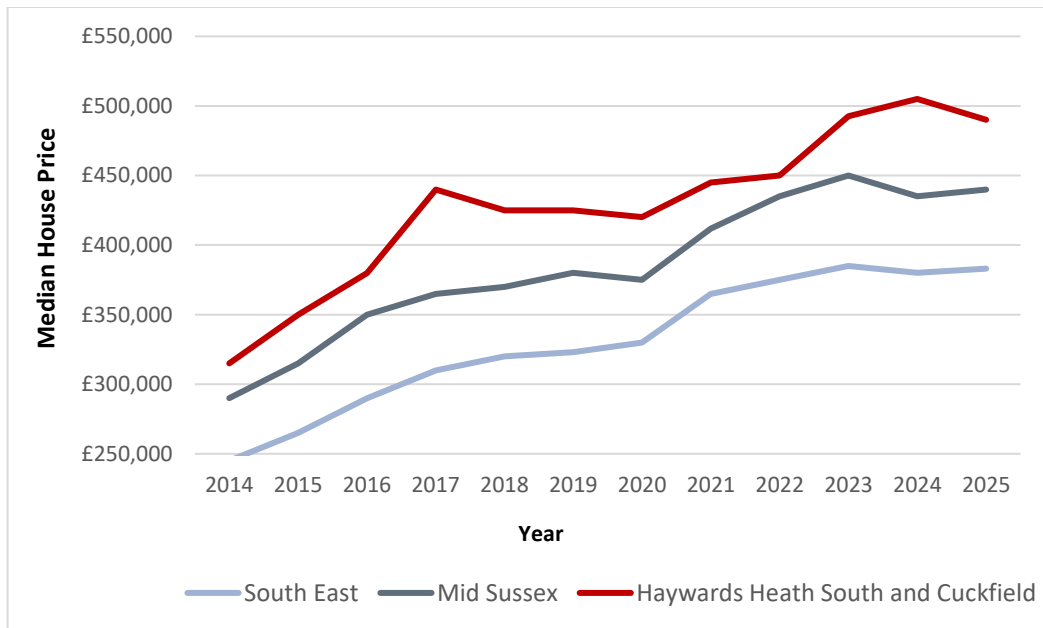
6.17 Figure 6.7 compares median house prices for the South East and Mid Sussex with those recorded in Haywards Heath South and Cuckfield (MSOA Mid Sussex 011). As with lower quartile house prices the data demonstrates that median house prices in Haywards Heath South and Cuckfield are consistently higher than the Mid Sussex average, reinforcing the scale of local affordability pressures. In particular, the data shows that:

- Median house prices in Haywards Heath South and Cuckfield have increased from £315,000 in 2014 to £490,000 in 2025, representing growth of around 56%. This exceeds the 52% increase recorded across Mid Sussex, indicating a stronger escalation in prices at the local level.
- The area has consistently recorded higher median house prices than the Mid Sussex average throughout the period, demonstrating that affordability pressures are particularly acute in this part of the District.
- By 2025, median house prices in Haywards Heath South and Cuckfield (£490,000) are around 11% higher than the Mid Sussex average (£440,000), highlighting a clear local affordability premium.
- This sits within a wider context where Mid Sussex itself is already significantly more expensive than both the South East and England, meaning that Haywards Heath South and Cuckfield represents a particularly high value and less affordable sub market even within an already expensive District.
- Over the most recent 12 month period, median prices in Haywards Heath South and Cuckfield have decreased by around 3%, compared to a modest increase of

1% across Mid Sussex. This suggests some short term volatility locally, although prices remain very high in absolute terms.

- The evidence shows that affordability pressures in Haywards Heath South and Cuckfield are both pronounced and long standing, with higher prices and stronger growth than the District average further constraining access to home ownership.

Figure 6.7: Median House Prices by MSOA, 2014 to 2025



Source: ONS Open Data.

- 6.18 Taken together, the median house price and affordability ratio trends demonstrate a clear and sustained worsening of affordability for typical households in Mid Sussex. Median prices have increased significantly over the period, whilst affordability ratios have remained consistently high, indicating that earnings growth has not kept pace with rising housing costs across the wider market.
- 6.19 Median house prices have risen by 52% since 2014, reaching £440,000 in 2025, and have remained consistently above both South East and national averages. This is reflected in affordability ratios which, despite a modest recent reduction, remain substantially higher than wider benchmarks, confirming that access to home ownership remains constrained for households on typical incomes. The MSOA level evidence for Haywards Heath South and Cuckfield reinforces this position, with median prices increasing by 56% to £490,000 and remaining around 11% above the District average. This demonstrates that affordability pressures are not only widespread but are particularly acute in certain localised markets within the District.
- 6.20 As a result, the evidence points to a persistent and structural disconnect between median house prices and local incomes. The combination of sustained price growth, elevated affordability ratios, and higher localised price points indicates that typical market housing is increasingly beyond the reach of many households. This reinforces the conclusion that affordability pressures extend across the whole market and supports the

need for continued and enhanced provision of a range of affordable housing tenures to address these barriers.

Conclusions

- 6.21 The evidence in this section demonstrates that households in Mid Sussex face sustained and significant affordability pressures in both the rental and ownership markets. Average private rents have risen steadily from already elevated baselines and have remained at equivalent levels to the South East and England. Similarly, lower quartile and median house prices have increased sharply over time while consistently exceeding regional and national benchmarks. Together, these trends confirm that Mid Sussex operates as a high cost housing market in which both renting and buying are increasingly difficult for many households.
- 6.22 When these price trends are viewed alongside earnings data, the scale of the affordability challenge becomes even clearer. Lower quartile and median workplace based affordability ratios have remained persistently elevated over the period and stand materially above those for both the South East and England. This means that households in Mid Sussex must commit a significantly greater share of their income simply to secure entry level or typical homes than comparable households elsewhere. The persistence of this premium over a prolonged period confirms that the local housing market is structurally less affordable and that many households who might reasonably expect to meet their own needs in the market are now unable to do so.
- 6.23 The local evidence for the Haywards Heath South and Cuckfield area reinforces and sharpens these conclusions. Lower quartile and median house prices across the MSOA have increased broadly in line with, and in some cases faster than, Mid Sussex wide trends. This demonstrates that the affordability pressures identified at the authority level are clearly experienced at the local level, with households in Haywards Heath South and Cuckfield facing high housing costs across both tenures relative to incomes.
- 6.24 In my view, these market conditions are not a temporary fluctuation but the manifestation of a deep seated imbalance between housing supply and need in Mid Sussex. The combination of high and rising rents, elevated house prices and worsening affordability ratios indicates that the market is failing to provide realistic routes into either home ownership or secure private renting for a substantial proportion of the population. This in turn increases pressure on the limited stock of affordable homes, exacerbating the levels of need identified in Section 4 and compounding the effects of past under delivery described in Section 5.
- 6.25 Overall, I conclude that worsening market conditions in Mid Sussex have created a severe and persistent affordability problem that can only be addressed through a significant increase in the supply of genuinely affordable homes. The evidence of high costs and deteriorating affordability across both tenures reinforces the urgent and pressing nature of affordable housing need in the authority area. In this context, the timely delivery of policy compliant affordable housing on suitable sites, including the 435 affordable homes proposed at the appeal site, is both necessary and justified and should attract substantial positive weight in the planning balance.

7. Future Supply of Affordable Housing

Introduction

- 7.1 This section focuses on the future supply of affordable housing in Mid Sussex, analysing projected delivery against identified needs over both the five year period and the remainder of the emerging Plan period. Drawing on the latest Five Year Housing Land Supply (5YHLS) trajectory and planning permissions data, it evaluates the extent to which planned developments are likely to address the District's affordable housing shortfall.

Methodology

- 7.2 In February 2026, the Council published the MS02: Housing Supply and Headroom Hearing Statement (**CD5.32**). Appendix 1 to the Statement sets out the Council's supply trajectory as at 1 April 2025 for the five year period from 1 April 2025 to 31 March 2030 and the remaining 10 years of the emerging Plan period from 1 April 2030 to 31 March 2040.
- 7.3 Over the five year period (2025/26-2029/30) the Council anticipates a total supply of 5,632 dwellings following sources of supply:
- A. Commitment - Site has Outline or Full Planning Permission - 3,332 dwellings
 - B. Commitment - Allocated sites without Planning Permission - 826 dwellings
 - C. Submission District Plan Housing Allocations (Yields updated as at January 2026) - 1,172 dwellings
 - D. Small sites (less than 5 dwellings) – 144 dwellings
 - E. Windfall Allowance – 158 dwellings
- 7.4 Over the remaining 10 year period (2030/31-2039/40) the Council anticipates a total supply of 11,285 dwellings following sources of supply:
- A. Commitment - Site has Outline or Full Planning Permission – 2,133 dwellings
 - B. Commitment - Allocated sites without Planning Permission – 1,556 dwellings
 - C. Submission District Plan Housing Allocations (Yields updated as at January 2026) – 6,090 dwellings
 - D. Small sites (less than 5 dwellings) – 0 dwellings
 - E. Windfall Allowance – 1,506 dwellings
- 7.5 For the purpose of this evidence, future affordable housing delivery has been calculated using sites included within the supply capable of delivering 5 dwellings or more, as these are considered to qualify for affordable housing contributions.
- 7.6 There are a number of sites included in the supply that do not yet have planning permission. For these sites I have assumed that policy compliant levels of affordable housing will be provided on site (i.e. 30%).

- 7.7 As larger sites often deliver housing across several phases and over an extended timeframe, a pro rata estimate of affordable housing contributions for the five year and 10 year periods has been applied.
- 7.8 I have not assumed any affordable housing delivery from the windfall allowance, since this is likely to comprise mostly smaller sites that fall outside the scope of Policy DP31 of the District Plan (2018).
- 7.9 A full breakdown of my analysis is available at **Appendix AG7**.

Five Year Housing Land Supply - Council's Position

- 7.10 My analysis reveals that, based upon the Council's estimates of delivery from sites within its trajectory, there is a likely pipeline supply of 1,583 gross affordable homes over the next five years (2025/26-2029/30), equivalent to an average of around 317⁹ affordable dwellings per annum.
- 7.11 Table 7.1 calculates the potential shortfall over the period, assuming delivery of an average of 317 gross affordable dwellings per annum over this period. It shows that **the existing shortfall of 1,213 dwellings will increase by around 155% to 3,098 dwellings by the end of the 2029/30 monitoring period**.

Table 7.1: Actual and Projected Additions to Affordable Housing Stock Compared to Affordable Needs Identified in the 2024 SHMA, 2020/21 to 2029/30

Monitoring Period	Additions to AH Stock		2024 SHMA Net Need (Pa.)	Shortfall	Cumulative shortfall
	Actual (Net)	Projected (Gross)			
2021/22	396		694	-298	-298
2022/23	522		694	-172	-470
2023/24	338		694	-356	-826
2024/25	307		694	-387	-1,213
2025/26		317	694	-377	-1,590
2026/27		317	694	-377	-1,967
2027/28		317	694	-377	-2,344
2028/29		317	694	-377	-2,721
2029/30		317	694	-377	-3,098
Totals	3,148		6,246	-3,098	

Source: MHCLG Open Data; Mid Sussex Public Access; MS02: Housing Supply and Headroom Hearing Statement (February 2026) and 2024 SHMA.

- 7.12 The Council's 5YHLS future supply figure derived from the analysis falls very substantially short of the 937 affordable dwellings per annum required when backlog needs are addressed in the first five years in line with the Sedgefield approach and substantially short of the 694 net affordable housing needs per annum identified in the 2024 SHMA.

⁹ 1,583 / 5 years = 316.52

- 7.13 The five year supply position is not agreed between the Council and the Appellants. At the time of writing, the 5YHLS Statement of Common Ground between the parties had yet to be agreed. As such, the above analysis is based on the Council's published trajectory and supply assumptions as set out within the MS02: Housing Supply and Headroom Hearing Statement (**CD5.32**).
- 7.14 Nevertheless, even on the basis of the Council's own published trajectory, the projected level of affordable housing delivery falls substantially short of identified needs over the next five years. Given that the five year supply position remains disputed and the Appellants contest the deliverability of a number of sites within the Council's trajectory, the actual level of affordable housing delivery achieved over the period is likely to be materially lower than that assumed in the analysis above.

Emerging Local Plan Period - Council's Position

- 7.15 My analysis indicates that, over the remaining 10 years of the emerging Plan period (2030/31-2039/40), there is a likely pipeline supply of 2,860 gross affordable homes, equivalent to an average of around 286¹⁰ affordable dwellings per annum.
- 7.16 Table 7.2 calculates the potential shortfall over the emerging Plan period, assuming delivery of an average of 317 gross affordable dwellings per annum will be delivered in the first five years (2025/26-2029/30) and delivery of an average of 286 gross affordable dwellings per annum over the remaining 10 years (2030/31-2039/40).

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¹⁰ 2,860 / 10 years = 286.02

Table 7.2: Actual and Projected Additions to Affordable Housing Stock Compared to Affordable Needs Identified in the 2024 SHMA, 2020/21 to 2039/40

Monitoring Period	Additions to AH Stock		2024 SHMA Net Need (Pa.)	Shortfall	Cumulative shortfall
	Actual (Net)	Projected (Gross)			
2021/22	396		694	-298	-298
2022/23	522		694	-172	-470
2023/24	338		694	-356	-826
2024/25	307		694	-387	-1,213
2025/26		317	694	-377	-1,590
2026/27		317	694	-377	-1,967
2027/28		317	694	-377	-2,344
2028/29		317	694	-377	-2,721
2029/30		317	694	-377	-3,098
2030/31		286	694	-408	-3,506
2031/32		286	694	-408	-3,914
2032/33		286	694	-408	-4,322
2033/34		286	694	-408	-4,730
2034/35		286	694	-408	-5,138
2035/36		286	694	-408	-5,546
2036/37		286	694	-408	-5,954
2037/38		286	694	-408	-6,362
2038/39		286	694	-408	-6,770
2039/40		286	694	-408	-7,178
Totals	6,008		13,186	-7,178	

Source: MHCLG Open Data; Mid Sussex Public Access; MS02: Housing Supply and Headroom Hearing Statement (February 2026) and 2024 SHMA.

- 7.17 Table 7.2 demonstrates that, based on the Council’s projected supply trajectory, affordable housing delivery will continue to fall substantially below identified needs throughout the remainder of the emerging Plan period. Even on the Council’s own assumptions, projected delivery would provide only 6,008 affordable homes between 2021/22 and 2039/40, against an identified need for 13,186 affordable homes over the same period. This would result in a cumulative shortfall of 7,178 affordable homes by the end of the Plan period, meaning that only around 46% of identified need would be met overall.
- 7.18 The analysis therefore indicates that more than half of the District’s identified affordable housing need would remain unmet over the emerging Plan period, notwithstanding the assumptions made regarding policy compliant delivery from future allocations and commitments. This demonstrates that the current trajectory is insufficient to meaningfully address either the existing backlog of unmet need or the ongoing annual need identified in the 2024 SHMA.

- 7.19 It is noted that, at the emerging Local Plan Hearing Sessions, the Council agreed to produce a 'long list' of additional sites that would be required to meet the Inspector's suggested housing requirement range of 1,200 to 1,300 dwellings per annum. Even assuming the upper end of that range, 30% affordable housing provision applied to 1,300 dwellings per annum would equate to 390 affordable dwellings per annum. This remains substantially below the 694 net affordable dwellings per annum identified in the 2024 SHMA.
- 7.20 As such, even if all housing delivered across the District achieved policy compliant levels of affordable housing provision, a substantial level of identified affordable housing need would still remain unmet over the Plan period. This further demonstrates the scale of the affordable housing challenge facing the District and the need to maximise delivery from sustainable development opportunities.

Conclusions

- 7.21 The evidence in this section demonstrates that, even on the Council's own published supply assumptions, future affordable housing delivery will fall substantially short of identified needs throughout both the five year period and the remainder of the emerging Plan period. The Council's trajectory indicates a likely supply of only 1,583 affordable homes over the next five years and 2,860 affordable homes over the remaining 10 years of the Plan period. This equates to average delivery rates of around 317 and 286 gross affordable dwellings per annum respectively, both materially below the identified need for 694 net affordable homes per annum set out in the 2024 SHMA.
- 7.22 The consequence of this sustained under delivery is that the existing backlog of unmet affordable housing need will continue to increase significantly over time. Based on the Council's own assumptions, the cumulative shortfall is projected to increase from 1,213 affordable homes in 2024/25 to 3,098 homes by 2029/30, and to 7,178 homes by the end of the emerging Plan period in 2039/40. Even on the Council's optimistic trajectory assumptions, only around 46% of identified affordable housing need would be met over the period to 2039/40.
- 7.23 Even if the Council were to identify sufficient additional sites to achieve the Inspector's suggested housing requirement range of 1,200 to 1,300 dwellings per annum, and even if all such development delivered 30% affordable housing provision, annual affordable housing output would still remain materially below identified needs. This confirms that the District faces a structural and long term affordable housing deficit which requires the maximum reasonable level of affordable housing delivery to be secured from sustainable development opportunities.
- 7.24 Furthermore, the analysis in this section is based on the Council's own published trajectory, notwithstanding the fact that the five year housing land supply position remains disputed and the Appellants challenge the deliverability of a number of sites within that trajectory. As such, there is a realistic prospect that actual affordable housing delivery over the five year period could fall below the already inadequate levels identified in this analysis, further exacerbating the scale of unmet need.
- 7.25 Taken together, the evidence demonstrates that the Council's projected future supply of affordable housing will not come close to meeting identified needs and that a substantial and worsening shortfall is likely to persist throughout the emerging Plan period. In these circumstances, developments capable of delivering policy compliant

affordable housing at scale make an important and necessary contribution towards addressing a clear and acute housing need.

8. Justification and Associated Benefits

Introduction

- 8.1 Pursuant to Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, when determining planning applications (and appeals) decision makers should first have regard to the relevant Development Plan as a whole, and then to any other material considerations.
- 8.2 Affordable housing serves a dual role in the planning process. It is both a Development Plan policy requirement and a material consideration. As a material consideration, the provision of affordable housing addresses wider societal needs, including housing affordability and social inclusion, thereby carrying weight in the planning balance.
- 8.3 In evaluating planning benefits (such as the provision of affordable housing) of a proposal, it is essential to recognise that compliance with policy, whether meeting or exceeding expectations, does not reduce a benefit's weight in the planning balance. Rather, the value of each benefit must be gauged on its own merits, considering the specific policy context and broader implications of the development.
- 8.4 As underscored in the *Vistry Homes Limited and Fairfax Acquisitions Limited v Secretary of State for Levelling Up, Housing and Communities and Others* [2024] EWHC 2088 (Admin) High Court Judgment (**CD14.7**) ('the Vistry Judgment'), the fact that a benefit aligns with policy requirements does not make it less significant; it should still contribute meaningfully to the overall planning balance. The judgment is clear at paragraph 154 that:
- "Whether a measure should be treated as a benefit, depends upon inter alia its nature and purpose, including whether it would help to meet a need which is, or is not, related to the development proposed."*
- 8.5 With particular regard to the weighting of the benefit of providing affordable housing, paragraph 157 emphasizes that:
- "I turn to consider questions of weight. If a decision-maker were to reduce the weight which he would otherwise give to a 40% provision of affordable housing because the development will provide the level of housing required by the development plan, that would also be objectionable, certainly in the absence of any logical explanation. The decision-maker should be assessing how the developer's contribution of affordable housing stands in relation to inter alia the justification in the development plan for the level of affordable housing required by the policy. Key considerations could include the level and nature of the need for affordable housing in the district and any shortfall in delivery." (emphasis added).*
- 8.6 As such, the judgment affirms that affordable housing delivery should not be viewed merely as a baseline expectation for compliance with planning policy but as a meaningful benefit that carries weight in decision-making. It is incumbent upon the decision-maker to evaluate the extent to which the affordable housing provision responds to specific

needs of an authority, particularly in the context of any existing deficiencies in meeting these needs and/or shortfalls in delivery when ascribing weight in the planning balance.

Assessment of Planning Benefits

Council's Position

- 8.7 The Committee Report (**CD3.1**) identifies that the proposed development would deliver up to 435 affordable homes (30%) as part of the overall scheme of 1,450 dwellings (**p.2, [2.1]; p.8, [3.1]**). The tenure mix is specified as 326 affordable rented units and 109 affordable home ownership units (**p.3-4, [2.9]**).
- 8.8 The Report confirms that the affordable housing offer complies with relevant Development Plan policies, including policies DP30 and DP31, and is therefore policy compliant in both quantum and mix (**p.3-4, [2.9]**).
- 8.9 In terms of planning judgment, the provision of affordable housing is identified as a significant public benefit of the scheme, forming part of the wider social benefits arising from the delivery of new housing in the District (**p.6, [2.25]; p.7, [2.36]**).
- 8.10 However, paragraphs 2.9 (p.4) and 13.8 (p.103) treat the delivery of “1,450 homes” as a single, combined benefit, stating that *“the delivery of this residential accommodation should be afforded substantial positive weight in the planning balance”*. In doing so, the Report does not distinguish between market housing and affordable housing as separate components of that benefit.
- 8.11 This approach understates the particular role of affordable housing. Affordable housing is a distinct policy objective, secured under a specific Development Plan policy (DP31), and directed towards meeting identified affordable housing need, which is separate from general housing supply.
- 8.12 By combining affordable housing within the wider “residential accommodation” benefit, the Report fails to recognise that affordable housing:
- addresses a different and more acute form of need, and
 - delivers a separate and additional planning benefit beyond market housing provision.
- 8.13 The consequence is that the Report effectively absorbs the affordable housing contribution within the overall housing figure, rather than recognising it as an independent benefit of the scheme. This results in an underrepresentation of its significance in addressing the District’s affordable housing shortfall.
- 8.14 The Council’s Statement of Case (SoC) (**CD15.2**) makes limited reference to affordable housing outside of policy compliance, other than at paragraph 9.10 (page 29), where it acknowledges that the scheme would deliver “new housing, including affordable housing” as part of a wider package of benefits.

- 8.15 In that regard, the Council accepts that the provision of affordable housing forms part of the benefits of the scheme. However, its treatment of this issue remains high level and does not include any detailed assessment of:
- the scale of affordable housing need within the District;
 - the extent of any existing shortfall in delivery; or
 - the degree to which the proposed development would contribute towards addressing that need.
- 8.16 In this context, the Council does not dispute that the delivery of up to 435 affordable homes would represent a benefit of the scheme. However, it does not separately assess the significance of that benefit, nor does it distinguish it from the general provision of market housing within the overall quantum of development.
- 8.17 Accordingly, whilst the Council acknowledges affordable housing as part of the scheme's benefits, its SoC does not provide a substantive or evidence-based evaluation of the extent to which the proposal would address the District's identified affordable housing needs, or the implications of that contribution in the overall planning balance.
- 8.18 Since the preparation of the Committee Report and Statement of Case, the Council has agreed within the main Planning Statement of Common Ground (**CD7.1, p.24, [4.77]**) that the provision of affordable housing at the appeal site, as an individual benefit, attracts **substantial positive weight** in the planning balance.
- 8.19 This represents an important distinction from the approach taken in the Committee Report, which subsumed affordable housing within the wider housing benefit rather than recognising it as a separate planning benefit in its own right.

Rule 6's Position

- 8.20 Ansty & Staplefield Parish Council and Cuckfield Parish Council have been granted Rule 6 Party status for this appeal. The Parish Councils' SoC (**CD15.3**) makes limited reference to affordable housing other than stating at paragraph 4.16 that:
- "The Parish Councils acknowledge that the appeal proposals would deliver benefits. The most significant of which is the provision of 1,450 homes, including 435 affordable dwellings. A 90 bed care home would also be a benefit. However, owing to the strategic scale of the proposals, these housing benefits will not be realised instantly."*
- 8.21 The Parish Councils' position therefore acknowledges the scale of the affordable housing provision proposed but makes no substantive assessment of its role in addressing identified affordable housing need or the extent to which it responds to the significant shortfall in provision across the District.
- 8.22 Instead, the focus is limited to the timing of delivery, noting that benefits will not be realised immediately. However, the phased nature of delivery is typical of developments of this scale and does not diminish the overall contribution the scheme will make towards meeting both existing and future affordable housing needs.

Appellant's Position

- 8.23 The proposed provision of up to 435 affordable homes is strongly justified in both policy and evidential terms. As set out throughout this Proof of Evidence, the scheme accords with the requirements of Policy DP31 of the Mid Sussex District Plan (2018), delivering a policy compliant level and tenure mix of affordable housing, whilst also directly responding to the substantial scale of affordable housing need identified across the District. The proposals therefore align with both Development Plan objectives and national policy support for significantly boosting the supply of affordable homes.
- 8.24 The policy support for the delivery of affordable housing must be considered in the context of the evidence base, which demonstrates that affordable housing need in Mid Sussex is both substantial and persistent. The Council's most recent evidence, the 2024 SHMA, identifies a net need for 694 affordable homes per annum across the District, equivalent to 13,186 affordable homes over the emerging Plan period. This represents a significant level of unmet need which substantially exceeds historic and projected rates of delivery.
- 8.25 Historic delivery has consistently failed to keep pace with identified need. Between 2021/22 and 2024/25, only 1,563 net affordable homes were delivered across Mid Sussex against a requirement for 2,776 affordable homes over the same period. This means that only 56% of identified need was met, resulting in a cumulative shortfall of 1,213 affordable homes in just four years. This is not a marginal or short term underperformance, but evidence of a sustained and structural failure to deliver sufficient affordable housing across the District.
- 8.26 The significance of that shortfall is not simply that delivery has been below needs in percentage terms, but that unmet need continues to accumulate year on year. As set out in Section 5, if the current shortfall is to be addressed over the next five years whilst also meeting newly arising need, the Council would need to achieve around 937 affordable homes per annum. This would represent a substantial increase above historic delivery rates and highlights the extent to which current provision is failing to meet identified needs.
- 8.27 The Council's own future supply evidence demonstrates that there is no realistic prospect of this position improving materially over the emerging Plan period. As set out in Section 7, the Council's trajectory indicates likely affordable housing delivery of around 317 affordable homes per annum over the next five years and around 286 affordable homes per annum over the remainder of the Plan period. Both figures fall substantially below identified need. On the basis of the Council's own trajectory assumptions, the cumulative affordable housing shortfall is projected to increase from 1,213 dwellings in 2024/25 to 7,178 dwellings by the end of the emerging Plan period in 2039/40, representing an increase of almost 500%.
- 8.28 In this context, the scale of affordable housing proposed by the appeal scheme is exceptional. The delivery of up to 435 affordable homes from a single development would represent around 63% of the annual affordable housing need identified in the 2024 SHMA. It would also exceed the total net affordable housing delivery achieved across the District in the most recent monitoring year and would represent the equivalent of more than a year of District wide affordable housing delivery based on

recent completion rates. The proposals would therefore make a substantial and meaningful contribution towards addressing both existing backlog needs and newly arising affordable housing needs across Mid Sussex.

- 8.29 The consequences of this sustained under-delivery are not merely numerical but have direct and significant effects on households. In the appeal at Land at Sondes Place Farm, Westcott Road, Dorking (**CD11.3, p.16, [88]**), the Inspector observed at paragraph 88 that:

“The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children’s education and development.”

- 8.30 This observation is directly relevant to the position in Mid Sussex, where the persistent gap between delivery and need has resulted in a growing backlog of unmet need. As set out in this evidence this has manifested through increasing waiting times, sustained reliance on temporary accommodation, and limited access to suitable and affordable homes. It demonstrates that under-delivery gives rise to real and ongoing consequences for households across the District.

- 8.31 The importance of this contribution is heightened further by the Council’s inability to demonstrate a five year housing land supply. In these circumstances, paragraph 11d(ii) of the NPPF is engaged and is explicit that particular regard should be had to the provision of affordable housing. The Government’s recent Written Ministerial Statements and consultation draft NPPF further reinforce the central importance of affordable housing delivery in addressing what has been described as an “acute and entrenched” housing crisis.

- 8.32 Alongside this clear policy justification, the material considerations examined throughout Sections 4 to 7 provide compelling evidence that affordable housing need in Mid Sussex is immediate and acute. There are currently 2,333 households on the Council’s Housing Register, representing a 29% increase since 2021. Waiting times for affordable housing extend to over 9 years for some 1 bedroom homes and more than 13 years for some 2 bedroom homes. At the same time, 101 households, including 89 children, are housed in temporary accommodation, whilst the Council spent £3,298,000 on temporary accommodation in 2024/25 alone.

- 8.33 These pressures are not abstract indicators but reflect the real world consequences of a sustained failure to provide sufficient affordable homes. The evidence demonstrates that households across the District are experiencing increasing barriers to accessing suitable housing, including prolonged periods in temporary accommodation, constrained access to family sized homes and worsening affordability pressures across both the rental and homeownership markets.

- 8.34 The appeal proposals directly respond to that context. They deliver a policy compliant level and tenure mix of affordable housing, provide a substantial quantum of affordable rented homes and affordable homeownership products, and would represent a significant increase in affordable housing provision in an area where delivery and turnover have historically been extremely limited.

8.35 Taken together, the Development Plan, national policy framework and material considerations point to a clear and consistent conclusion. Affordable housing need in Mid Sussex is substantial, persistent, and worsening, delivery has consistently fallen materially below identified needs, and the Council's own future supply evidence demonstrates that this position is likely to deteriorate further over time. In these circumstances, the provision of up to 435 affordable homes at the appeal site represents a substantial and important planning benefit which should attract **substantial positive weight** in the planning balance.

Conclusions

8.36 The affordable housing proposed by the appeal proposals is justified by both policy and evidence. It accords with the requirements of Policy DP31 of the Development Plan and directly responds to the scale of affordable housing need identified across Mid Sussex.

8.37 The analysis in Sections 4 to 7 demonstrates that affordable housing need in Mid Sussex is substantial, persistent, and worsening. Historic delivery has consistently fallen below identified needs, future projected supply will continue to fall materially short of need, and the resulting shortfall is projected to increase significantly over the emerging Plan period. At the same time, the Housing Register, waiting time data, temporary accommodation figures, homelessness pressures, and market indicators all demonstrate that households across the District are already experiencing the consequences of this under delivery.

8.38 Against that background, the proposed delivery of up to 435 affordable homes is of exceptional importance. It would exceed the total net affordable housing delivery achieved across the District in the most recent monitoring year and would represent the equivalent of more than a year of District wide affordable housing delivery based on recent delivery rates. Locally, it would represent a substantial increase in affordable housing provision in an area where affordable housing delivery and turnover have historically been extremely limited.

8.39 The appeal proposals would therefore make a substantial and meaningful contribution towards addressing both existing affordable housing needs and the growing backlog of unmet need across the District. The affordable housing provided by the appeal proposals should accordingly be recognised as one of the principal benefits of the scheme and afforded **substantial positive weight** in the planning balance.

9. Summary

Introduction

- 9.1 There is extensive evidence highlighting the severity of the national housing crisis in the UK, which leaves millions of people unable to secure adequate accommodation that meets their needs. It is evident that a significant increase in housing delivery, particularly affordable housing, is crucial to addressing the housing crisis.
- 9.2 The NPPF is clear that in order to meet the social dimension of sustainable development **it is imperative to ensure that a sufficient number and range of homes can be provided to meet the needs of present and future generations** (paragraph 8b). In this respect it is also important to acknowledge the Government's objective of significantly boosting the supply of homes (paragraph 61).
- 9.3 This evidence has demonstrated that the housing crisis is particularly acute in Mid Sussex, where the delivery of affordable housing has persistently fallen short of identified needs. Market signals indicate a worsening trend in affordability across the District, and, by any measure of affordability, the Council is amid an affordable housing emergency. Urgent action must be taken to deliver more affordable homes.

Affordable Housing Offer

- 9.4 The proposed development is for up to 1,450 dwellings, of which 30% (up to 435 homes) are to be provided on-site as affordable housing.
- 9.5 This level of provision meets the expectations of Policy DP31 of the Mid Sussex District Plan (2018) which seeks 30% provision from qualifying developments. The proposed tenure split of the affordable housing units is 75% Affordable Rent (up to 326 homes) and 25% First Homes (up to 109 homes).
- 9.6 As set out in Paragraph 12.33 of the Committee Report (**CD3.1**), the tenure split aligns with the requirements of District Plan Policy DP31. Paragraph 12.36 of the Committee Report goes on to confirm that the scheme would provide a policy compliant affordable housing provision.
- 9.7 The affordable housing provision will be secured through a Section 106 Planning Obligation.

Policy Justification and Material Considerations

- 9.8 The proposed provision of up to 435 affordable homes is strongly supported by both the Development Plan and wider material considerations. The appeal proposals deliver a policy compliant level and tenure mix of affordable housing in accordance with Policy DP31 of the Mid Sussex District Plan (2018), whilst also responding directly to the substantial scale of affordable housing need identified across the District.
- 9.9 The justification for the proposed affordable housing provision must be considered in the context of the evidence presented throughout this Proof of Evidence, including the

identified scale of affordable housing need, historic under delivery, projected future shortfalls and worsening affordability pressures across the District. The material considerations which support the proposed affordable housing provision can be summarised as follows:

- The Council's most recent evidence, the 2024 SHMA, identifies a net need for 694 affordable homes per annum across Mid Sussex, equivalent to 13,186 affordable homes over the emerging Plan period. This demonstrates that affordable housing need across the District is substantial and persistent.
- Historic delivery has consistently failed to meet identified needs. Between 2021/22 and 2024/25, only 1,563 net affordable homes were delivered against an identified requirement for 2,776 homes, resulting in a cumulative shortfall of 1,213 affordable homes in only four years.
- The scale of under delivery is continuing to worsen. In order to address the existing backlog whilst also meeting newly arising affordable housing needs over the next five years, delivery would need to increase to approximately 937 affordable homes per annum, substantially above historic delivery rates.
- The Council's own trajectory evidence demonstrates that there is no realistic prospect of affordable housing needs being met through the projected supply pipeline. The Council anticipates delivery of around 317 affordable homes per annum over the next five years and around 286 affordable homes per annum over the remainder of the emerging Plan period, both materially below identified need.
- On the Council's own evidence, the cumulative affordable housing shortfall is projected to increase to 7,178 affordable homes by the end of the emerging Plan period in 2039/40, meaning that more than half of identified affordable housing needs would remain unmet.
- The proposed delivery of up to 435 affordable homes from a single development would therefore represent a substantial contribution towards addressing identified needs. The scheme would provide the equivalent of approximately 63% of the annual affordable housing need identified in the 2024 SHMA and would exceed the total affordable housing delivery achieved across the District in the most recent monitoring year.
- The importance of this contribution is heightened by the Council's inability to demonstrate a five year housing land supply. In these circumstances, paragraph 11d(ii) of the NPPF is engaged and expressly requires particular regard to be had to the provision of affordable housing.
- The wider evidence on affordability, Housing Register growth, waiting times, temporary accommodation and homelessness further demonstrates that affordable housing need in Mid Sussex is immediate and acute. There are currently 2,333 households on the Housing Register, waiting times for some affordable homes exceed 9 years, and 101 households, including 89 children, are currently housed in temporary accommodation.

- The appeal proposals would directly respond to those pressures by delivering a substantial quantum of affordable rented homes and affordable homeownership products in an area where affordable housing delivery and turnover have historically been limited.

9.10 Taken together, the Development Plan, national policy framework and wider material considerations all point towards a clear and consistent conclusion. Affordable housing need in Mid Sussex is substantial, delivery has persistently fallen below identified needs, and the Council's own evidence demonstrates that this position is likely to deteriorate further over time.

9.11 In these circumstances, the proposed delivery of up to 435 affordable homes would make a substantial and meaningful contribution towards addressing both existing affordable housing needs and the growing backlog of unmet need across the District.

Planning Benefits

9.12 The proposed development directly addresses these critical housing needs by delivering a balanced mix of affordable homes that supports a range of incomes. It aligns with national planning policy objectives, which emphasises meeting housing needs in full and delivering a variety of affordable housing options. The weight of this planning benefit is substantial and should be recognised as a key consideration in the determination of this appeal.

9.13 The proposed development offers an exceptional opportunity to deliver urgently needed affordable housing in Mid Sussex. By addressing both current and future housing needs, it aligns with local and national policy objectives, representing a sustainable and positive contribution to the District's housing market. **Substantial positive weight** should be given to this benefit in the planning balance.

Turley Bristol Office
40 Queen Square
Bristol
BS1 4QP

T 0117 989 7000