

Inspector's Matters, Issues & Questions (MIQs)

Matter 3 – Housing – Wednesday 2 June

3.1: New Homes Quantum (Policies SA10 & SA11)

3.1(ii) The Plan makes provision for 1,764 dwellings in its site allocations (SA12 -SA33), which amounts to an 'over-supply' or buffer of 484 dwellings over the residual housing requirement, which is identified as 1,280 dwellings in Table 2.3 of the Plan. Does this increased housing provision, which equates to 37.8% above the minimum residual requirement or 2.95% above the minimum District requirement of 16,390 dwellings over the plan period, amount to a sufficient buffer to enable the Plan to ensure there is enough flexibility of housing land over the plan period? If the Plan is found to be insufficiently flexible in this regard, what further steps should the Council take to rectify this? Are there any sound arguments to support the notion that the amount of the buffer is too great or has been incorrectly applied? Is the buffer excessive in relation to the requirements of paragraph 73 of the NPPF or Framework?

- 1.1 In respect to the last part of this question, we do not consider that there is any credible reason to contend that the buffer provided for is too great for a variety of reasons. The housing requirement set out within the District Plan is a minimum figure, i.e. is a floor, not a ceiling. Furthermore, Mid-Sussex, in common with the majority of other authorities in the South East, has an increasing affordability issue. Home ownership in the District continues to be beyond the reach of many people with the price of new homes currently between 13-14 times average earnings (a rate double the average for England), as illustrated by data from the ONS contained within the following table:

House price to workplace earnings ratios ¹	2016	2017	2018	2019
Ratio of median house price to median gross annual workplace-based earnings (MSDC / England)	12.61 / 7.72	12.60 / 7.92	12.68 / 8.04	13.01 / 7.83
Ratio of lower quartile house price to lower quartile gross annual workplace-based earnings (MSDC / England)	13.95 / 7.16	13.19 / 7.26	12.98 / 7.34	13.80 / 7.27

- 1.2 The continuing high cost of new homes is also reflected in the latest SHMA (2014) which identifies an annual need of up to 474 new affordable homes.
- 1.3 The proposed headroom ensures that the Plan remains robust in the event that there is some slippage in delivery of housing from allocated or committed sites, whilst also providing scope in continuing to help meet the significant unmet need from Crawley which is particularly acute given the tightly drawn administrative boundaries around the town. The overall plan provision would also provide more affordable housing and go further to address serious and deteriorating housing

¹<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

affordability. Furthermore, the principle of ensuring a buffer in housing supply, in order to meet the identified need, is well established by the NPPF.

- 1.4 This particular issue was considered by the Inspector examining the Guildford Local Plan which identified a housing supply of 14,602 new homes against a requirement of 10,678 new homes (a buffer of 27%). This buffer was considered acceptable by the Inspector for similar reasons to that set out above (see paragraphs 42 and 46 of the [Inspector's Report](#)). The need for a buffer was found to contribute to an "exceptional circumstances" case for the release of land from the Green Belt in Guildford, and that approach was upheld by the High Court: *Compton Parish Council v Guildford BC* [2020] JPL 661. On this basis we consider that the proposed buffer is entirely appropriate. As the buffer is for the whole of the remaining plan period, rather than the next five year period, we do not consider that paragraph 73 of the NPPF is relevant in this case however it would clearly assist in demonstrating a 5 year housing land supply on adoption.

3.2: Proposed Distribution of New Homes

Does the proposed distribution of the additional new homes in the allocations in the Plan (as set out in table 2.5) to meet the Minimum Residual Housing Requirement, accord with the principles of sustainable development, particularly as set out in policies DP4 to DP6 of the District Plan, including taking account of considerations such as:

- (i) ***Enabling the most sustainable pattern of growth for Mid Sussex, based primarily on the three towns, including the majority of development to be directed towards the town of Burgess Hill, and having regard to be sensitive to key environmental considerations, such as the setting of the SDNP, the High Weald AONB, the Ashdown Forest 7km Zone of Influence, landform and visual impact, conservation of important conservation and heritage assets, wildlife conservation and constraints such as areas at risk to significant flooding;***
- 1.5 We consider that the proposed distribution of new homes would be consistent with the Council's spatial strategy, as articulated within Policies DP4-6 of the District Plan, and would result in the most sustainable growth for Mid-Sussex. Site SA19 would represent an extension of the built up boundary of East Grinstead which is defined as one of three Category 1 settlements in the District. We note that whilst the site falls within close proximity to the administrative boundary of Tandridge and the settlement of Felbridge, the site is immediately adjacent to the built up boundary of East Grinstead which has been established since 2002 (as set out within document [TP2](#)).
- 1.6 As is noted by Table 12 of the Councils Sustainability Appraisal (ref: SUS1) there is a residual housing requirement for East Grinstead of 706 new homes (which represents the residual requirement of all Category 1 settlements). In light of this residual requirement and given that the settlement is one of the three most sustainable settlements in the District it is entirely appropriate for additional sites to be allocated around East Grinstead to deliver this new housing. The proposed allocation of SA19 will therefore make an important contribution towards meeting this residual requirement.
- 1.7 As set out within our response to question 3.3 the proposed allocation of SA19 would not have any adverse impact on key environmental considerations that could not be sufficiently mitigated.

3.9: Is the range of the size of housing allocations in the Plan appropriate to address the qualitative requirements of the District?

- 1.8 As set out in Table 2.5, the Plan seeks to allocate sites that range in size and which we believe together with the strategic sites allocated within the District Plan will deliver a mix of new housing in line with the requirements of Policy DP30 of the District Plan.
- 1.9 The Council's [Strategic Housing Market Assessment Update](#) (2012) notes that in respect to market housing the demand is for family housing which will need to be delivered through infill developments, new urban extensions, rural settlement expansion and town centre regeneration as appropriate. It continues by stating that the larger development sites provide the best opportunity to deliver larger homes and a broader mix of size (recommendation R12, page 75). The SHMA also makes recommendations of affordable housing mix (Table 17, page 75).
- 1.10 The proposed allocation of SA19 would facilitate the delivery of new family accommodation and a mix of affordable housing in accordance with the recommendations of the SHMA making a positive contribution to meeting the qualitative requirements of the District. As set out within our response to question 3.3, the whole of the site is within the control of a national housebuilder who has a proven track record in the delivery of new housing. The delivery of medium sized sites such as SA19 is therefore important to not only ensuring that the right mix of housing is delivered but also that there is a 'rolling' supply of housing sufficient to demonstrate a 5 year supply.