



# Hearing Statement – Matter 2: Housing Supply

**Mid Sussex District Council – Examination in Public**

**Prepared on behalf of Miller Homes Ltd**

Prepared by:

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SLR Project No.: 433.000082.00001

13 February 2026

Revision: 00

## Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
00	13 February 2026	AMunton	NB	NB
	<a href="#">Click to enter a date.</a>			



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## **1.0 Introduction**

- 1.1 This statement has been prepared by SLR Consulting Ltd on behalf of Miller Homes Ltd in respect of the Mid Sussex District Plan (2021 – 2039) Examination in Public. The Statement focuses on questions raised by the Inspector in their MIQs in relation to Matter 2: The Housing supply and headroom.
- 1.2 By way of background, Miller Homes has an interest in land at Colwell Farm ('the site'), which is located on the eastern edge of Haywards Heath and has the capacity to deliver up to 80 new homes on the edge of one of the district's most sustainable settlements. The location of the site is shown in Appendix 1.

## 2.0 Housing Supply

2.1. Matter 2 of the Inspector’s MIQs seeks to establish whether enough housing land has been allocated to ensure that, along with existing permissions and commitments, enough housing land will come forward to meet the housing requirement through the life of the plan and that a 5-year housing land supply will be maintained. Specifically, the Inspector sets out four sub-topics:

- a) Anticipated housing supply over the plan period
- b) The amount of potential supply headroom over and above the housing requirement
- c) The supply trajectory over the plan period
- d) The potential for lower than anticipated supply arising from delivery impediments, longer lead in times and slower build out rates
- e) The resilience of the plan against such contingencies
- f) The 5-year housing land supply position at adoption
- g) The ability to maintain a rolling 5-year housing land supply

2.2. This statement addresses matters relevant to topic area a-b and d-g. Given our comments on these topics, we do not believe it is possible comment on topic c), save to say this needs to be reviewed in light of our other comments. A new housing trajectory paper was issued by MSDC on 12th February, the day before the statement deadline. There has been insufficient time to review this new evidence thoroughly; suffice it to note it will require scrutiny at the EiP hearing sessions.

### **Topic a) Anticipated housing supply over the plan period**

2.3. Overall, we do not believe sufficient land is being allocated for housing. We set out in our response to Matter 1 our concerns with the housing need number, but council is only setting out to deliver enough homes for that need, not what can be delivered.

2.4. The current allocations are heavily weighted towards three large sites, where the small and medium sites<sup>1</sup> (all other allocations) make up only 20% of the total proposed homes (or 27% if you include sites DPSC3-7). This leaves the council’s plan open to failure.

2.5. The Lichfields’ Start to Finish 3 report clearly sets out that:

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<sup>1</sup> We have used the Lichfields’ Start to Finish 3 for the basis of defining Small and Medium sites, where ‘Small’ is 1-9 homes and ‘Medium’ is 10-99 homes

- 2.5.1. Only sites of 99 dwellings or fewer can, on average, be expected to deliver anything in a five-year period from validation of a planning application, with delivery of the first dwelling on average taking 3.8 years.
  - 2.5.2. The median time for sites of 100-499 dwellings to deliver the first dwelling is 5.2 years.
  - 2.5.3. The median time for sites of 1,000-1,499 dwellings to deliver the first dwelling is 5.4 years.
- 2.6. The Lichfields' study also sets out the average build-out rates. For schemes of 50-99 homes, it ranges between 16-22dpa with a maximum of 31dpa, for schemes of 100-499 homes it ranges between 35-60dpa with a maximum of 122dpa and for schemes 1,000-1,499 homes it ranges between 68-101dpa with a maximum of 172dpa.
- 2.7. It is therefore clear that the proposed three large sites are susceptible to not delivering the number of homes needed in the plan period. What's more, those above 100 homes hold similar risks for the first five and ten years of the plan period.
- 2.8. The three large sites are:
- 2.8.1. Site DPSC1 – Land to the West of Burgess Hill and North of Hurstpierpoint for 1,350 homes. To date no application of Screening has been submitted.
  - 2.8.2. Site DPSC2 – Land at Crabbet Park, Copthorne for 1,500 homes. To date no application of Screening has been submitted.
  - 2.8.3. Site DPSC3 – Land to the south of Reeds Lane, Sayers Common for 1,850 homes. To date no application of Screening has been submitted.
- 2.9. We believe that more small and medium sites, below 100 homes, need to be included in the plan to better support the delivery of homes needed over the plan period and to reduce the risks of slower and lower delivery of the larger sites.
- 2.10. The Mid Sussex SHELAA includes many more sites that MSDC has chosen not to include as housing allocations in the plan, including sites that reached stage 3 of the site assessment stages. Whilst it is not for our reps to set out all of those sites that could be included, which we believe are many, our client's site at Land at Colwell Farm, which was recommended for approval by professional MSDC planning officers, is one clear example for 80 homes.
- 2.11. We conclude that there are serious doubts about the delivery of homes over the plan period.

**Topic b) The amount of potential supply headroom over and above the housing requirement**

- 2.12. For the reasons set out in our Matter 1 statement we do not believe that there is currently the headroom the council sets out.
- 2.13. While the recent track record of delivery in Mid Sussex has been good, the large sites in the previous plan have been slow to be delivered. The allocation of three large sites, which make up about 70% of the total new housing delivery allocations, continues this

risk into the next plan period. We therefore propose that a headroom of 10% should be included, which will provide certainty that the strategy is deliverable over the plan period for the reasons we have set out in paragraphs 2.5-2.7.

2.14. As such, the council needs to significantly increase its supply of small and medium sites to meet this requirement.

**Topic d) The potential for lower than anticipated supply arising from delivery impediments, longer lead in times and slower build out rates**

2.15. See our comments at paragraphs 2.5-2.7 above.

**Topics f) and g) The 5-year housing land supply position at adoption and the ability to maintain a rolling 5-year housing land supply**

2.16. The 5-year housing supply position is directly related to the housing figure in the plan and, ultimately, the permissions granted against that housing need. As we have set out in our response to Matter 1, we believe the housing figure to be wrong. As such, the 5-year housing supply need is higher in our opinion.

2.17. Even against the council's proposed (stepped) housing requirement of 999 dpa and a 5% buffer, table 19 (page 24) of topic paper MS-TP2 explains that this equates to 5.37 years (a surplus in the 5YHLS of 387 dwellings). This is not a comfortable position for the council and plan's future and leaves the plan in precarious position where only one or two sites not coming forward (or being delayed) will leave the council without a 5-year housing land supply.

2.18. We believe that the council can be in a position to deliver and maintain a 5-year housing supply, but it needs to allocate more small and medium-sized sites than it currently does.

2.19. However, it should be noted that based on the local housing need of 1,358 dwellings and a 5% buffer, the Council's supply figure of 5,632 dwellings equates to 3.95 years. This is important to note because the government charges councils to significantly boost housing supply.

2.20. Furthermore, if the Council's housing requirement is changed or its plan period shifted forward (as advocated in our Matter 1 Statement), this will have the effect of increasing the requirement for the 5YHLS and likely result in MSDC being unable to demonstrate a sufficient supply on adoption of the plan without first allocating more sites. This is without adding further unmet housing needs to the requirement beyond the Council's current modest contribution.

2.21. We believe that the council does have a supply of suitable smaller and medium sized sites of under 100 homes, as evidenced by their SHELLA, which can deliver quickly within the first 5 years of the plan. One such site, is controlled by our client at is Land at Colwell Farm, which was recommended for approval by professional planning officers, albeit subsequently refused at committee.

2.22. As currently drafted, we believe the council will encounter problems with its 5-year housing supply in the early years, due to its reliance on larger sites. This can be plainly

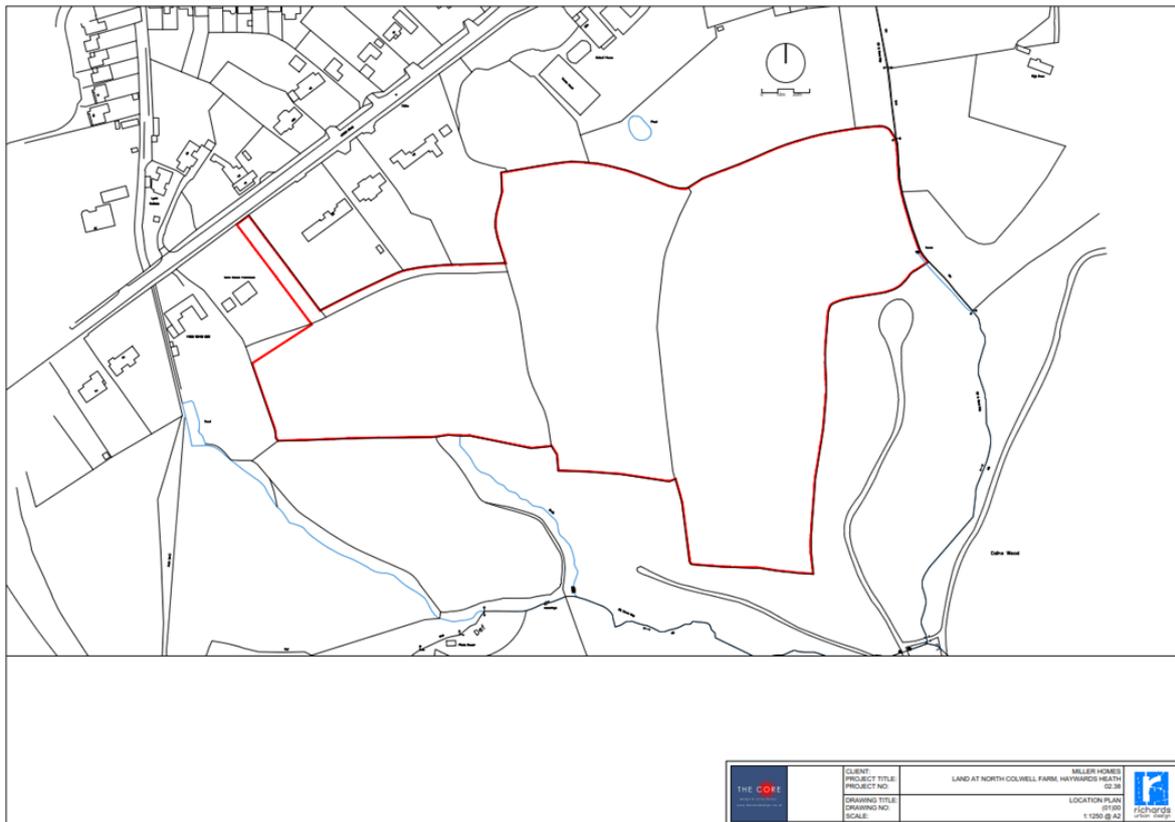
seen where the council's housing supply has increased by 575 homes overall, but the small and medium sites contribution has only increased by 2 (two) homes. Simply, more smaller sites from the council's SHELAA need to be allocated in the plan.

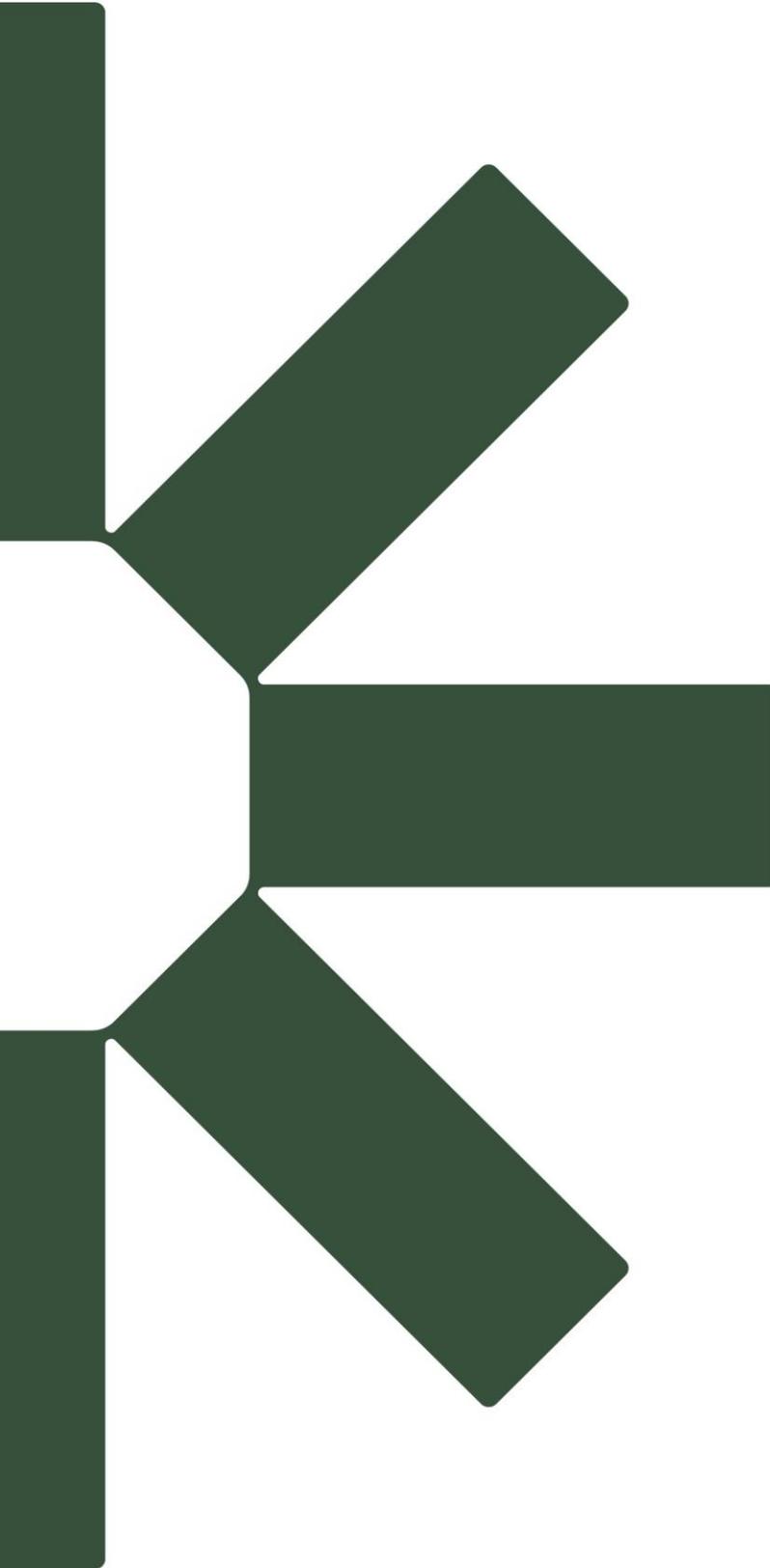
### 3.0 Conclusion

- 3.1. We recommend the following modifications in order for the Plan to meet NPPF soundness tests:
- 3.2. **MM1** – Increase the percentage of small and medium sites' (up to 100 homes) contribution in the local plan housing supply and trajectory. We therefore propose that a larger base of small and medium sites to support the three large sites are needed.
- 3.3. **MM2** – Include headroom of 10% in the housing numbers (separate from any unmet need contribution) to improve the robustness of the plan and help ensure increased housing delivery.

# Appendix A Colwell Farm, Haywards Heath: Site Location Plan

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