

Technical note re: Mid Sussex District Council's Five Year Housing
Land Supply (5YHLS)

For Miller Homes Limited | 26-091

Up to 80 dwellings with associated landscaping, open space, infrastructure and
vehicular and pedestrian accesses – Colwell Farm, Haywards Heath
LPA ref: DM/25/0445



Project: 26-091
Site Address: Colwell Farm, Haywards Heath
Client: Miller Homes Limited
Date: Wednesday, February 11, 2026
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1. Introduction

- 1.1 This technical note is submitted on behalf of Miller Homes Limited (the Appellant) in support of its appeal against the decision of Mid Sussex District Council's decision to refuse outline planning permission for:

“up to 80 dwellings with associated landscaping, open space, infrastructure and vehicular and pedestrian accesses.”

At Colwell Farm, Haywards Heath (LPA ref: DM/25/0445).

- 1.2 It addresses the Council's 5 Year Housing Land Supply (5YHLS). It should be read alongside the technical note prepared by Tetlow King in relation to affordable housing and the statement of case prepared by SLR Consulting in relation to all other planning matters.



2. Current 5YHLS Position

- 2.1 From the outset, the Council accepts that it cannot currently demonstrate a 5YHLS.

The 5YHLS requirement

- 2.2 The adopted strategic policies of the Sussex District Plan 2014 - 2031 (adopted March 2018) are more than five years old and have not been reviewed and found to be up to date. Therefore, in accordance with paragraph 78 and footnote 39 of the Framework, the 5YHLS should currently be calculated against the local housing need calculated using the standard method set out in the PPG. This is currently 1,358 dwellings per annum. In addition, a 5% buffer should be applied. Therefore, the 5YHLS requirement is 7,130 dwellings (i.e. $1,358 \times 5 \text{ years} + 5\% = 7,130$ dwellings), which equates to 1,426 dwellings per annum.
- 2.3 The 5YHLS will continue to be calculated against the local housing need calculated using the standard method until the Mid Sussex District Plan 2021-2039 is adopted. This is discussed in the following section of this note.

The Council's latest published position on 5YHLS – October 2023

- 2.4 The Council's latest published 5YHLS position remains that set out in the "Housing Land Supply Position Statement 1 April 2023 – October update". It was originally published over 2.5 years ago in July 2023 and updated over 2 years ago in October 2023. This document explains that at 1st April 2023, the Council considered the deliverable supply to be 5,770 dwellings, which against the local housing need (at 1st April 2023 of 1,090 dwellings per annum – calculated using the previous standard method) and a 5% buffer equates to 5.04 years. Against the local housing need calculated using the current standard method of 1,358 dwellings per annum and a 5% buffer, the Council's supply figure of 5,770 dwellings equates to **4.04 years**.
- 2.5 The Council's latest published position on 5YHLS at 1st April 2023 is also referred to in the Council's most recent Authority Monitoring Report (AMR) 1 April 2023 – 31 March 2024, published in December 2024.

Scamps Hill, Lindfield Appeal (PINS ref: 3350075) – May 2025

- 2.6 An appeal made by Gladman Developments Ltd against the decision of the Council to refuse to grant outline planning permission for up to 90 dwellings at Scamps Hill, Lindfield, was considered at a public inquiry which took place in January 2025. The appeal was allowed and the decision notice was issued on 2nd May 2025.



2.7 The Council's Statement of Case (SoC) for the Scamps Hill appeal was issued on 3rd October 2024. Paragraph 3.20 on page 9 of the Council's SoC for that appeal states:

"The Council's most recently published land supply position was established through an appeal at Henfield Road, Albourne (PINS reference APP/D380/W/23/3319542) which determined in October 2023 that the Council can demonstrate 5.04 years' worth of housing land supply as-at April 2023. The Council has not yet calculated its position as-at April 2024 which will be published in the normal manner in the Authority Monitoring Report towards the end of the year."

2.8 The Case Management Conference (CMC) for the Scamps Hill appeal took place on 14th October 2024. At the CMC, the Council explained that its current 5YHLS position at that time was that set out at 1st April 2023 but it was working on a new position statement (base date 1st April 2024).

2.9 Whilst it has not published it on its "Consultation & Monitoring" section of its website, the Council's evidence for the Scamps Hill appeal provided its position at 1st April 2024. The Council's evidence was that at 1st April 2024 it could demonstrate a deliverable supply of 4,815 dwellings. Against the local housing need calculated using the current standard method (but using previous data inputs) of 1,356 dwellings per annum and a 5% buffer, the Council's supply figure equated to **3.38 years**.

2.10 Emery Planning prepared the evidence in relation to the 5YHLS for the Appellant at that appeal. Our case was that at 1st April 2024, the Council could demonstrate a deliverable supply of 3,427 dwellings, which equates to **2.41 years**. The difference between the two figures of 1,388 dwellings was because the Appellant disputed the inclusion of dwellings on the following 13 sites:

Table 2.1 – Disputed sites at the Scamps Hill appeal

Ref:	Address	No. of dwellings disputed
1125	Brookleigh, care element, Hill, 1C	60
493	Brookleigh, Burgess Hill (remainder)	635
832	Land west of Selsfield Road, Ardingly	35
1113	Linden House, Southdowns Park, Haywards Heath	14
827	Land south of 96 Folders Lane, Burgess Hill (SA12)	40
840	Woodfield House, Isaacs Lane, Burgess Hill (SA17)	29
479	Land at Hanlye Lane, east of Ardingly Road, Cuckfield (SA23)	55



Ref:	Address	No. of dwellings disputed
196	Land south of Crawley Down Road, Felbridge	170
770	Land south and west of Imberhorne Upper School, East Grinstead (SA20)	75
246	Hurst Farm, Hurstwood Lane, Haywards Heath	215
807	Land south of the Old Police House, Birchgrove Road, Horsted Keynes (SA28)	25
477	Land adjacent to Cookhams, south of Top Road, Sharpthorne	13
847	Former East Grinstead Police Station, East Grinstead (SA18)	22
	Total	1,388

2.11 Both the Council's 3.38 figure and the Appellant's 2.41 year figure are recorded in paragraph 96 of the Scamps Hill appeal decision, which states:

"The Council suggest they have 3.38 years housing land supply, whereas the Appellant suggests it is 2.41 years. The variation is due to the differences in anticipated delivery of various large sites. However, as both parties agreed to describe the shortfall as significant, the issue was not contested at the Inquiry"

Committee report for the appeal application – August 2025

2.12 The committee report for the appeal application explains that the Council is unable to demonstrate a 5YHLS. However, the base date of the calculation and the extent of the shortfall in the 5YHLS are not referred to. The summary of the comments provided by the Planning Policy Officer in relation to the 5YHLS are as follows:

"Paragraph 78 of the National Planning Policy Framework (NPPF) requires local planning authorities to "identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old."

The adopted District Plan is now more than five years old. Therefore, the housing land supply is measured against Government's standard method. The standard method is currently 1,334 dwellings per annum (dpa), compared to the 1,090dpa if the adopted Plan figure were applied. Whilst the Council has performed excellently against other



Government measures of delivery (Housing Delivery Test) the Council is currently unable to demonstrate a five-year supply of deliverable housing sites.”

The Council’s latest evidence on 5YHLS for the Mid Sussex Local Plan examination – 26th January 2026

- 2.13 On 17th December 2025, the Local Plan Inspector (Inspector Jonathan Bore) wrote to the Council to request topic papers relating to (amongst other things) the proposed housing requirement, unmet need in the housing market area and the anticipated housing supply position.
- 2.14 On 26th January 2026, the Council published its response to the Inspector’s letter of 17th December 2025. This is set out in a Local Plan examination document: “MS-TP2: Housing” dated January 2026. The contents of this document in relation to the proposed housing requirement are set out in the following section to this statement. However, it does set out that the Council considers its deliverable supply at 1st April 2025 is 5,632 dwellings.
- 2.15 Against 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.
- 2.16 The 5,632 figure is the Council’s prediction of the anticipated deliverable supply on adoption of the Local Plan. For example, table 18 (page 23) of “MS-TP2” explains that the 5,632 figure includes (amongst other sources of supply):
- 252 dwellings on draft District Allocations with planning applications pending determination: and
 - 431 dwellings on draft District Allocations without applications submitted.
- 2.17 This is of note because the allocation of these sites is subject to the outcome of the examination of the Local Plan. Examination hearing sessions which are scheduled to take place in March 2026 are due to consider some of the draft allocations.
- 2.18 Nevertheless, even including these sites, the Council cannot demonstrate a 5YHLS at 1st April 2025 against the local housing need and a 5% buffer.

Latest position – February 2026

- 2.19 The Council continues to accept for decision-making purposes that it cannot demonstrate a 5YHLS. For example, in a report to the Planning Committee meeting on 12th February 2026 regarding an application for up to 40 dwellings at land at Old Vicarage Field, Turners Hill (LPA ref: DM/25/1467), the Council refers to the fact that it cannot demonstrate a 5YHLS. Again, the base date of the calculation and the extent of the shortfall in the 5YHLS are not referred to.



Summary in relation to the current 5YHLS position

2.20 As set out above, the Council accepts that it cannot currently demonstrate a 5YHLS. We have set out the figures based on the Council's published supply figure (at 1st April 2023), its supply figure for the Scamps Hill appeal (at 1st April 2024) and its supply figure for the Local Plan examination (at 1st April 2025) in the table below.

Table 2.2 – Summary position of the Council's current 5YHLS position

		1 st April 2023 Published position	1 st April 2024 Scamps Hill Appeal	1 st April 2025 MS-TP2
	Requirement			
A	Annual local housing need	1,358	1,358	1,358
B	5YHLS requirement without buffer (A X 5 years)	6,790	6,790	6,790
C	5YHLS requirement plus 5% buffer (B + 5%)	7,130	7,130	7,130
D	Annual 5YHLS requirement including 5% buffer (C / 5 years)	1,426	1,426	1,426
	Supply			
E	Council's deliverable supply	5,770	4,815	5,632
F	Supply in years (E / D)	4.04	3.38	3.95
G	Shortfall in 5YHLS (E – C)	-1,360	-2,315	-1,498

2.21 As set out in section 4 of this statement, the Appellant will provide its own assessment of the deliverable supply and set this out in evidence.



3. Draft emerging 5YHLS position

- 3.1 As set out above, on 26th January 2026, the Council published on its Local Plan examination website a topic paper called “MS-TP2”. This states that the Council considers the deliverable supply at 1st April 2025 is 5,632 dwellings. Against the proposed (stepped) housing requirement of 999 dwellings per annum 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).

The draft emerging 5YHLS requirement

- 3.2 Topic paper MS-TP2 explains that the proposed housing requirement over the emerging Local Plan period 2021 to 2040 is 20,674 dwellings. This comprises of 18,981 dwellings to meet housing needs in Mid Sussex based on the local housing need calculated under the previous standard method of 999 dwellings per annum (i.e. $999 \times 19 \text{ years} = 18,981$) and 1,693 dwellings towards meeting some of the unmet housing need in the Northern West Sussex HMA, predominantly at Crawley.
- 3.3 Table 14 (page 20) of MS-TP2 explains that the 1,693 contribution towards unmet need was calculated based on the total proposed supply in the Mid Sussex Local Plan of 21,241 dwellings minus the need for Mid Sussex of 18,981 dwellings and a headroom of 567 dwellings (i.e. $21,241 - 18,981 - 567 = 1,693$).
- 3.4 The housing requirement of 20,674 dwellings equates to 1,088 dwellings. However, table 15 (page 21) of topic paper MS-TP2 proposes that the housing requirement is stepped as follows:
- 999 dwellings per annum from 2021/22 to 2030/31; and
 - 1,187 dwellings per annum from 2031/32 to 2039/40.
- 3.5 The Council’s proposed housing requirement is subject to examination. The Local Plan Inspector has identified Matter 1 as: “The housing requirement, including LHN and unmet needs” and the following issues in relation to this:

“Whether the plan’s housing requirement makes sufficient provision for new homes.

a) Local housing need

b) Unmet need from neighbouring authorities and its effect on the plan’s housing requirement

c) Whether the housing requirement needs to be uplifted to meet any other need such as that for affordable housing

d) Whether a stepped requirement is appropriate”



- 3.6 Matter 1 is due to be discussed at the hearing sessions due to take place on Tuesday 24th February and the morning of Wednesday 25th February 2026.
- 3.7 It is not known as this stage whether the proposed housing requirement will be found sound. The key issues are discussed below.

Local housing need

- 3.8 Table 1 (page 4) of MS-TP2 explains that local housing need at the time the local plan was submitted was 1,090 dwellings per annum but it is now 999 dwellings per annum. It explains that the base date for calculating the local housing need is 1st April 2025. It is calculated using the previous version of the standard method. It uses the 2014 household projections to set the baseline by projecting the average annual household growth over the 10-year period 2025-35 and applies an affordability adjustment using the median workplace-based affordability ratios published in March 2025.
- 3.9 As a result, the base date of the Local Plan should be 1st April 2025 and not 2021. This is because the affordability adjustment in step 2 of the standard method takes account of past delivery as set out in paragraphs 68-031-20190722 and 2a-011-20190220 of the PPG. Therefore, by using the local housing need (LHN) at 2025, any past over or under supply pre-2025 has already been factored into the calculation of LHN and therefore the base date of the Local Plan should have the same date as the LHN calculation.
- 3.10 This issue was recently considered by the Inspector examining the North Norfolk Local Plan. In that case the local housing need was calculated to a 2024 base date. In a letter dated 24th May 2024, the Inspector in that case stated:

“The local housing need methodology takes account of any previous over or under supply, so there is no shortfall or surplus arising pre 2024 to add to this figure”

- 3.11 More recently, the issue was considered by the Inspector examining the Winchester Local Plan. In a letter dated 10th September 2025, the Inspector in that case stated:

“I am not convinced by the way in which the Council has derived the Plan’s housing requirement from LHN. The Plan’s most recent calculation of LHN was in 2024. The Plan’s housing requirement as set out in policy H1 runs from 2020-2040. The Plan’s housing requirement therefore includes completions since the start of the Plan period. It therefore includes completions that took place before the latest calculation of LHN.

The calculation of LHN is a forward-looking assessment of housing needs. From the point at which LHN is calculated it takes account of what has happened in previous years. The National Planning Practice Guidance (PPG) confirms that in calculating LHN using the standard method, the affordability adjustment is applied to take account of past under delivery. Whilst the PPG refers to past under delivery in this light, and is



silent on over-delivery, I take a common-sense approach on this matter. For this reason, past supply prior to the latest calculation of LHN (2024) should not be taken into account in deriving the Plan's housing requirement due to the effect of the affordability ratio in the standard method."

Unmet need and the housing requirement

- 3.12 It is not known whether the contribution of 1,693 dwellings towards unmet need from elsewhere in the nearby Housing market Areas will be found sound. It is based on the surplus supply in Mid Sussex once Mid Sussex's own needs have been accounted for and a headroom has been applied. The figure appears to have been selected so that the Council has an overall housing requirement which is just over 80% (80.1%) of the local housing need due to transitional arrangements and in an attempt to avoid the 20% buffer applying from 1st July 2026.
- 3.13 However, paragraph 3.28 (page 19) of MS-TP2 explains that the unmet need in Crawley is 7,505 dwellings. It is unclear why additional sites have not been allocated in Mid Sussex, to assist in addressing more of Crawley's unmet need
- 3.14 Nevertheless, even based on an unmet need figure of 1,693 dwellings, changing the base date of the Local Plan to 1st April 2025 would mean the requirement over the plan period 2025 to 2040 is 16,678 dwellings i.e. :
- 14,985 dwellings to meet Mid Sussex's needs (i.e. $999 \times 15 \text{ years} = 14,985$); plus
 - 1,693 dwellings for the contribution towards unmet need from elsewhere in the HMAs.
- 3.15 This would mean that the headroom for resilience is reduced from 567 dwellings to 239 dwellings because the total proposed supply set out in table 14 (page 20) of MS-TP2 excluding completions up to 2025 is 16,917 dwellings. (i.e. $16,917 - 16,678 = 239$). Again, the issue of the headroom is to be tested through the Local Plan examination.

The stepped housing requirement

- 3.16 As above, the Council proposes to step the housing requirement so that only Mid Sussex's needs are met up to 2031. By then (assuming that the Local Plan were adopted in 2026), the Local Plan will be more than five years old and if it has not been updated already, it will need updating to address the housing need as calculated using the current standard method (currently 1,358 dwellings per annum). At that time, the 5YHLS will also be calculated against the local housing need rather than the adopted housing requirement. The local housing need is only Mid Sussex's needs and does not include unmet needs from elsewhere.



- 3.17 The PPG (paragraph 68-021-20190722) states that a stepped housing requirement may be appropriate where there is a significant change in the level of housing between the emerging and previous policies. However, this is not the case in Mid Sussex, where the current adopted housing requirement of 964 dwellings per annum is 89% of the proposed annual average requirement in the new Local Plan of 1,088 dwellings per annum.
- 3.18 The Council also considers that dwellings have been completed on sites earlier in the plan period. However, as above, the Council has effectively reset the base date of the Local Plan by recalculating the local housing need at 1st April 2025 and for the reasons set out above, this already takes into account past delivery.

Summary in relation to the proposed housing requirement

- 3.19 For the reasons above, it is not known whether the proposed housing requirement will be found sound. The Local Plan Inspector has identified several issues in relation to the housing requirement, which are to be examined at the hearing sessions in February 2026. Until the Council's proposed housing requirement, including its approaches to the base date for calculating the local housing need, unmet need and a stepped requirement have been found sound, then the 5YHLS requirement upon adoption of the Local Plan is not known.
- 3.20 This affects whether the Council can demonstrate a 5YHLS. For example, if the stepped requirement is rejected then the Council cannot demonstrate a 5YHLS. The claimed 5,632 dwellings supply against the annual average requirement of 1,088 dwellings and a 5% buffer equates to 4.93 years.

The buffer

- 3.21 The 5% buffer currently applies due to the latest housing delivery test result being more than 85%. The 20% buffer will apply from 1st July 2026 if the adopted housing requirement is less than 80% of the local housing need.
- 3.22 Paragraph 3.33 (page 20) of topic paper MS-TP2, states that as the Council's proposed housing requirement of 1,088 dwellings is 80.1% of the local housing need, the 20% buffer will not apply from 1st July 2026.
- 3.23 Even using the Council's proposed housing requirement, this assumes that the local housing need remains at or is less than 1,358 dwellings per annum. However, this is based on affordability data and housing stock data published in March and May 2025 respectively. Should affordability worsen and / or the housing stock increase with the new data sets then the local housing need will increase. The local housing need would only have to increase by 3 dwellings per annum to 1,361 dwellings per annum for the proposed housing



requirement of 1,088 dwellings to be less than 80%. Given that the housing stock is expected to increase by around 837 dwellings which were completed in 2024/25, it is likely that the 20% buffer will apply from 1st July 2026.

- 3.24 In addition, whether the Council can rely on its proposal to address unmet need from elsewhere to avoid the 20% buffer from July 2026 will be considered during the examination of the Local Plan. The 999 figure to meet Mid Sussex's needs in the Local Plan is just 73.5% of the current local housing need of 1,358 dwellings per annum. Under transitional arrangements, the Council is allowed to use the previous standard method for the Local Plan. However, there remains significant unmet demand for homes in Mid Sussex as a result.
- 3.25 The Government's response to the then draft Framework in December 2024 explained that in such circumstances a 20% buffer should be applied (beyond July 2026) to close the gap between the adopted figure and the local housing need.

“there are many authorities whose local housing need figures will be substantially larger than their adopted or emerging local plan housing requirement figures, indicating a significant unmet demand for new homes in these areas. To help close the gap, we are introducing a new requirement that authorities with plans adopted under the old standard method must provide an extra year's worth of homes in their 5-year housing pipeline.

As such, those authorities whose adopted plan annual housing requirement figure is 80% or less of their annual local housing need figure will be required to add a 20% buffer to their 5-year housing land supply from 1 July 2026. This window will give these authorities time to make provision for the new policy. As with other housing supply buffers, this will not be cumulative, so those authorities who are already required to add a 20% buffer due to scoring below 85% in the most recent housing delivery test will not be required to add an additional buffer should they meet these criteria.”

- 3.26 Therefore, as there is a significant unmet demand for new homes in Mid Sussex, the 20% buffer is required to help close the gap.

The deliverable supply

- 3.27 As set out above, topic paper MS-TP2 states that the deliverable supply at 1st April 2025 is 5,632 dwellings. However, this includes proposed allocations which are the subject of examination. Whether these sites should be allocated and if they are whether there is “clear evidence” that they are “deliverable” as per the definition set out in the annex on page 72 of the Framework will be considered by the Local Plan Inspector.
- 3.28 In addition, whilst the trajectory in topic paper MS-TP2 includes other category b) sites in relation to the definition of “deliverable”, such as those allocated in the existing Local Plan and those with outline



planning permission, the topic paper itself does not explain why the Council considers these sites are deliverable or provide the clear evidence for their inclusion.

- 3.29 One example is the Brookleigh, Burgess Hill (remainder) site. 785 dwellings are included in the 5YHLS at this site, including 83 dwellings in the current year, 2025/26. However, this part of the site only had outline planning permission at 1st April 2025. Whilst other parcels of this site are being delivered and are included elsewhere in the 5YHLS, the Council has not provided clear evidence for the inclusion of the remainder of the site in the 5YHLS or how any development will happen before 1st April 2026.
- 3.30 The lead-in times and build rates of other sites will also be considered at the Local Plan examination. For example, the trajectory in MS-TP2 includes the delivery of dwellings on some sites from April 2027 (i.e. 14 months from now) when a planning application has not been made.
- 3.31 The build rates proposed will also be assessed. For example, the site known as Fallow Wood has proposed build rates of 108 dwellings in 2026/27 and 98 dwellings in 2027/28. The position at 1st April 2024 claimed that 104 dwellings would be delivered in 2024/25. However, the trajectory in MS-TP2 confirms that only 10 dwellings were completed on this site in that year.
- 3.32 The Local Plan Inspector has identified Matter 2 as: “Housing supply and headroom” and the following issues in relation to this:

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.

- 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

- 3.33 Matter 2 is due to be discussed at the hearing sessions due to take place on Thursday 26th and Friday 27th February 2026.
- 3.34 In summary, it is not known what the deliverable supply will be or whether the Council’s trajectory in topic paper MS-TP2 will be found sound. As above, the surplus in the 5YHLS – even against the Council’s



proposed housing requirement - is only 387 dwellings (about 7% of the claimed supply). The removal of 387 dwellings on sites from the claimed deliverable supply and / or the extension of lead-in times and reduction of build rates will mean that the Council cannot demonstrate a 5YHLS on adoption of the Local Plan.



4. The Appellant's 5YHLS case

- 4.1 The Appellant will seek to agree the base date of the 5YHLS calculation with the Council. Given that the Council's recent topic paper for the Local Plan examination sets out the position at 1st April 2025, the 5YHLS period should be 1st April 2025 to 31st March 2030.
- 4.2 The Appellant will seek to agree the figure the 5YHLS should be calculated against. Until the adoption of the emerging Local Plan, this will be the local housing need calculated using the standard method. This is currently 1,358 dwellings per annum.
- 4.3 The Appellant will seek to agree the correct buffer to be applied. Based on the latest housing delivery test result, this will be the 5% buffer.
- 4.4 The Appellant will work with the Council to understand what its deliverable supply position is at 1st April 2025 for decision-making purposes. As above, whilst the Council's topic paper sets out the supply at 1st April 2025, this includes sites which are proposed allocations in the draft Local Plan and are the subject of examination.
- 4.5 The Appellant will set out in its evidence what it considers the deliverable supply is now and in the event the Local Plan is adopted.
- 4.6 The Appellant will seek to agree with the Council that it cannot demonstrate a deliverable supply.
- 4.7 The Appellant will work with the Council to produce a topic specific Statement of Common Ground in relation to 5YHLS.



