

TOWN AND COUNTRY PLANNING ACT 1990

**AFFORDABLE HOUSING STATEMENT OF COMMON
GROUND IN RESPECT OF AFFORDABLE HOUSING
NEEDS AND DELIVERY ACROSS THE MID SUSSEX
DISTRICT COUNCIL ADMINISTRATIVE AREA**

SECTION 78 APPEAL

**Outline application with all matters reserved except
for means of access, for up to 80 dwellings with
associated landscaping, open space, infrastructure
and vehicular and pedestrian access**

Colwell Farm, Haywards Heath

Miller Homes Limited

19 June 2026

PINS REF: 6005786

LPA REF: DM/25/0445 / AP/26/0023

APPELLANT REF: 0203-03.M26.RPT

1.0 Affordable Housing

- 1.1 This Statement of Common Ground (SoCG) deals specifically with affordable housing, however, should be read in conjunction with the overarching SoCG which was signed on 5 May 2026.
- 1.2 The overarching SoCG does reach agreement on some matters pertaining to affordable housing, however, following publication of new data, some of the statistics agreed have been superseded. The latest statistical data is, therefore, set out in this Affordable Housing SoCG and cross-referenced back to the overarching SoCG to show how the position has changed.
- 1.3 The appeal proposals seek outline planning permission for up to 80 dwellings, of which 30% are proposed as affordable homes equivalent to up to 24 affordable homes.
- 1.4 It is agreed the proposed development therefore complies with the requirements of the adopted Mid Sussex District Plan (MSDP) Policy DP31: Affordable Housing which seeks 30% provision of affordable housing from qualifying developments.
- 1.5 The affordable housing provision will be secured through a Section 106 Agreement with the precise size and tenure breakdown being agreed as part of subsequent Reserved Matters application(s), with a starting point being a tenure split of 75% social/affordable rent and 25% as First Homes.
- 1.6 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent national planning policy, including the National Planning Policy Framework (NPPF).

2.0 National Planning Policy and Guidance

- 2.1 The NPPF was most recently updated on 12 December 2024, with a very minor update following in February 2025, and is a material planning consideration. It identifies the role of affordable housing in the plan-making and decision-taking processes.
- 2.2 The NPPF sets a strong emphasis on the delivery of sustainable development. Fundamental to the social objective set out at paragraph 8(b) is to *“support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations.”*

- 2.3 At the heart of the NPPF is the presumption in favour of sustainable development contained at paragraph 11. Under paragraph 11c, proposals which accord with an up to date Development Plan should be approved without delay. Under paragraph 11d, where the most important policies are out of date, permission should be granted unless the policies in the NPPF provide a strong reason for refusal, or where any adverse impacts of the scheme significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF as a whole.
- 2.4 The December 2024 revisions to the NPPF expand the decision-taker's assessment under paragraph 11d to have *"particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well designed places and providing affordable homes, individually or in combination"*. In doing so, the NPPF now makes affordable housing a central part of applying the presumption to which the decision-taker must have particular regard.
- 2.5 Chapter 5 of the NPPF focuses on delivering a sufficient supply of homes, in which paragraph 61 is clear that:
- "to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed [...] The overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community."*
- 2.6 Paragraph 61 identifies the 'overall aim' is to meet an area's identified housing need. Paragraph 62 clarifies that *"to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance."*
- 2.7 Paragraph 63 also makes clear that *"within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing..."*.
- 2.8 The NPPF requires all major developments (involving the provision of housing) to provide affordable housing. In particular, paragraph 66 establishes that *"where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified*

local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.”

- 2.9 Affordable housing is defined within the glossary of the NPPF (Annex 2) as *“housing for sale or rent, for those whose needs are not met by the market [...] and which complies with one or more of the following definitions”* before identifying four categories of affordable housing: Social Rent in accordance with Government’s conditions and requirements, other affordable housing for rent which is at least 20% below market value, discounted market sales housing which is at least 20% below market value, other affordable routes to home ownership including shared ownership, relevant equity loans, other low-cost homes for sale (which are delivered in Mid Sussex as First Homes and with a minimum 30% below local market value) and rent to buy (which includes a period of intermediate rent).

Draft National Planning Policy Framework for Consultation (December 2025)

- 2.10 On 16 December 2025 the Ministry of Housing, Communities, and Local Government (MHCLG) opened a consultation on proposed changes to the planning system, including the NPPF. The consultation closed at 11:45 on 10 March 2026. The consultation draft of the revised NPPF is a material consideration but carries limited weight ahead of publication. Paragraph 4.17 of the signed overarching SoCG confirms the parties agree the consultation draft NPPF (2025) carries only limited weight.
- 2.11 The draft December 2025 NPPF places additional emphasis on the delivery of affordable housing, within the context of the wider proposed changes to the planning system which seek to make *“planning policy easier to use, underpin the development of faster and simpler Local Plans, and be more directive of decision-making in support of both appropriate housing and commercial development ...”*.
- 2.12 Draft Policy HO5 (meeting the needs of different groups) requires Development Plans to includes policies that set requirements for the type and mix of affordable housing *“required to meet identified needs”*.
- 2.13 Draft Policy HO8 (providing affordable homes) establishes that development proposals are expected to *“meet or exceed up-to-date development plan requirements”* for the relevant mix of affordable housing tenures.

- 2.14 The Planning Practice Guidance (“PPG”) was first published online on 6 March 2014 and is subject to ongoing updates. It replaced the remainder of the planning guidance documents not already covered by the NPPF and provides further guidance on that document’s application. The PPG is divided into sections. Section 2a provides guidance on ‘Housing and Economic Needs Assessment’, section 67 on ‘Housing Needs of Different Groups’, and section 68 on ‘Housing Supply and Delivery’ and includes the following advice:

Section	Paragraph	Commentary
Housing and Economic Needs Assessment	006 Reference ID: 2a-00620241212	This section sets out that assessments of housing need should include consideration of and be adjusted to address affordability. This paragraph sets out that <i>“an affordability adjustment is applied as housing stock on its own is insufficient as an indicator of future housing need.”</i> This is because: • <i>“Housing stock represents existing patterns of housing and means that all areas contribute to meeting housing needs. The affordability adjustment directs more homes to where they are most needed</i> • <i>People may want to live in an area in which they do not reside currently, for example to be near work, but be unable to find appropriate accommodation that they can afford.”</i> <i>“The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objectives of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes.”</i>
Housing and Economic Needs Assessment	018 Reference ID: 2a-01820190220	Sets out that <i>“all households whose needs are not met by the market can be considered in affordable housing need. The definition of affordable housing is set out in Annex 2 of the National Planning Policy Framework”.</i>

Section	Paragraph	Commentary
Housing and Economic Needs Assessment	019 Reference ID 2a – 01920190220	States that “ <i>strategic policy making authorities will need to estimate the current number of households and projected number of households who lack their own housing or who cannot afford to meet their housing needs in the market. This should involve working with colleagues in their relevant authority (e.g. housing, health and social care departments).</i> ”
Housing and Economic Needs Assessments	020 Reference ID 2a 02020190220	The paragraph sets out that in order to calculate gross need for affordable housing, “<i>strategic policy-making authorities can establish the unmet (gross) need for affordable housing by assessing past trends and current estimates of:</i> • <i>The number of homeless households;</i> • <i>The number of those in priority need who are currently housed in temporary accommodation;</i> • <i>The number of households in over-crowded housing;</i> • <i>The number of concealed households;</i> • <i>The number of existing affordable housing tenants in need (i.e. householders currently housed in unsuitable dwellings); and</i> • <i>The number of households from other tenures in need and those that cannot afford their own homes, either to rent, or to own, where that is their aspiration</i>”.
Housing and Economic Needs Assessment	024 Reference ID 2a 02420190220	The paragraph states that “<i>the total need for affordable housing will need to be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow based on the Plan period.</i>” It also details that: <i>“An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”</i>

Section	Paragraph	Commentary
Housing Needs of Different Groups	001 Reference ID 67 001- 20190722	Sets out the relationship between affordable housing need and overall housing need: <i>"This need [for specific groups of people] may well exceed, or be proportionally high in relation to, the overall housing need figure calculated using the standard method. This is because the needs of particular groups will often be calculated having consideration to the whole population of an area as a baseline as opposed to the projected new households which form the baseline for the standard method."</i>
Housing Supply and Delivery	022 Reference ID 68 031- 20190722	With regard to how past shortfalls in housing completions against planned requirements should be addressed, the paragraph states: <i>"The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirement for the next 5 year period (the Sedgefield approach)...."</i>

3.0 Affordable Housing Delivery in Mid Sussex

3.1 Figure 1 illustrates the delivery of affordable housing in Mid Sussex since the start of the District Plan period in 2014/15.

Figure 1: Gross Additions to Affordable Housing Stock 2014/15 to 2025/26

Monitoring Year	Total Housing Completions	Additions to AH stock	Gross affordable additions as a %age of total completions
	(Net)	(Gross)	
2014/15	630	221	35%
2015/16	868	113	13%
2016/17	912	176	19%
2017/18	843	97	12%
2018/19	661	102	15%
2019/20	1,003	214	21%
2020/21	1,116	245	22%
2021/22	1,187	349	29%
2022/23	1,053	369	35%
2023/24	1,247	300*	24%
2024/25	837**	324*	39%
2025/26	889**	373*	42%
Totals	11,246	2,883	26%
Avg. Pa.	937	240	

Source: FOI Response (16 October 2025), *FOI Response (15 May 2026), **Completions from Mid Sussex Housing Land Supply Monitoring Completions

- 3.2 Between 2014/15 and 2025/26, a total of 11,246 dwellings were delivered in Mid Sussex, equivalent to 937 per annum. Of these, 2,883 dwellings were affordable tenures, equivalent to 240 per annum. This equates to 26% gross affordable housing delivery.
- 3.3 As the affordable housing completions figure is a gross figure it does not take into account any losses from the affordable housing stock through the Right to Buy.
- 3.4 Figure 2 below sets out net affordable housing delivery in Mid Sussex since the start of the District Plan period in 2014/15, net of RtB sales.

Figure 2: Net of Right to Buy Additions to Affordable Housing Stock, 2014/15 to 2025/26 (2025/26 is gross as RtB data not available at the time of writing)

Monitoring Year	Total housing completions (Net)	Additions to AH Stock (Gross)	RP RtB Sales	Additions to AH Stock (Net of RtB)	Net of RtB additions as a %age of total completions
	A	B	C	D (B – C)	E (D / A) X 100
2014/15	630	221	3	218	35%
2015/16	868	113	7	106	12%
2016/17	912	176	4	172	19%
2017/18	843	97	1	96	11%
2018/19	661	102	4	98	15%
2019/20	1,003	214	3	211	21%
2020/21	1,116	245	1	244	22%
2021/22	1,187	349	2	347	29%
2022/23	1,053	369	2	367	35%
2023/24	1,247	300*	0	300	24%
2024/25	837**	324*	1	323	39%
2025/26	889**	373*	Unknown	373	42%
Totals	11,246	2,883	28	2,855	25%
Avg. Pa.	937	240	3	238	

Source: FOI Response (16 October 2025), * FOI Response (15 May 2026), **Completions from Mid Sussex Housing Land Supply Monitoring Completions.

- 3.5 Figure 2 demonstrates that on average between 2014/15 and 2025/26, the Council has added just 2,855 affordable dwellings per annum net of Right to Buy sales and additions from acquisitions. The net delivery as a percentage of total completions is 25% (please note 2025/26 is gross as RtB data not available at the time of writing).

4.0 Affordable Housing Need in Mid Sussex

4.1 The District Local Plan does not identify an affordable housing target but instead relies on the findings of the most recent housing needs assessment.

4.2 The latest housing needs assessment is set out in the 2024 SHMA Update which identifies at table 3.4, a net need of **383 affordable rent or social rent per annum between 2021 and 2040**. In addition, table 3.7 of the 2024 SHMA Update identifies the net need for **intermediate/low-cost home ownership of 311 per annum**. However, the HNA notes there will be potential supply of housing from the existing market so the need for this type of affordable property is less clear-cut.

5.0 Affordable Housing Delivery Compared to Objectively Assessed Needs

5.1 When comparison is drawn between affordable housing delivery and the needs identified in the most recent 2024 SHMA Update since its base date in 2021/22, Figure 3 shows an accumulated shortfall in delivery of affordable housing of some -205 affordable homes against an estimated need for 1,915 affordable dwellings over the five-year period. This shortfall would be significantly greater if affordable home ownership needs were also taken into account, with the unmet need increasing by approximately sevenfold.

Figure 3: Net of Right to Buy Additions to Affordable Housing Stock vs Affordable Rent/Social Rent Needs Identified in the 2024 SHMA Update, 2021/22 to 2025/26*

Monitoring Period	Additions to AH Stock (Net of RtB*)	2024 SHMA Update AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2021/22	347	383	-36	-36	91%
2022/23	367	383	-16	-52	96%
2023/24	300	383	-83	-135	78%
2024/25	323	383	-60	-195	84%
2025/26	373*	383	-10	-205	97%
Total	1,710	1,915	-205		89%
Avg. Pa.	342	383	-41		

Source: Figure 2 above and 2024 SHMA Update (*2025/26 are gross as RtB not available at the time of writing)

6.0 Affordability Indictors

- 6.1 The following affordability indicators are material considerations and in this particular case demonstrate a worsening situation in Mid Sussex for a household seeking an affordable home. A number of these indicators were reported in the overarching SoCG, however, since then more recent data for 2025/26 has been published so overleaf is a comparison of the data contained in the signed SoCG and the latest position:

Figure 4: Update on Affordability Indicators (Signed SoCG compared to Latest Position)

Affordability Indictors	Signed SoCG Position	Latest Position
Council's Housing Register	As of 31 March 2025, there were 2,468 households on the Housing Register ¹ increased by 18% from 2,097 households on 31 March 2024 to 2,468 households on 31 March 2025.	As of 31 March 2026, there were 2,441 households on the Housing Register ² , an increase of 6% from 2,468 households on the Housing Register on 31 March 2025.
Temporary Accommodation	As of 31 March 2025 there are 106 households living in temporary accommodation in Mid-Sussex ³ , a 20% increase from 2024. Of these households, 45 are households with children. Since 2022 the number of households living in temporary accommodation with children has increased by 67%.	As of 31 March 2026, Mid Sussex District Council housed 43 households in Temporary Accommodation ⁴ . Of these, 29 households were housed within Mid Sussex and 14 households (33%) were housed outside the District.

¹ MHCLG Live Tables

² Housing Officer 19.06.2026

³ MHCLG Live Tables

⁴ FOI Response (May 2026)

Affordability Indicators	Signed SoCG Position	Latest Position
Temporary Accommodation spend	In 2024, Mid-Sussex spent £2,510,000 on temporary accommodation ⁵ .	Unchanged.
House price to income ratio (affordability ratio).	Median and lower quartile affordability ratios for Mid-Sussex in 2025 (standing at 10.94 and 11.23 respectively) are significantly higher than the South East average (9.58 and 9.56) and national average (7.63 and 6.98) ⁶ .	Unchanged.
House prices	Both the median and lower quartile house prices for Mid-Sussex are significantly higher than both the national and regional averages.	The lower quartile house price in Middle Layer Super Output Area ("MSOA") Mid Sussex 008 MSOA is £397,000 in 2025; an increase of 50% from 2014 ⁷ .

6.2 Affordability indicators not included within the overarching signed SoCG are summarised as follows:

- Average waiting times for an affordable property across Mid Sussex ranged from 319 days (2-bed affordable property) to 767 days as of 31 March 2025⁸ (4+bed affordable property).
- In terms of affordable properties to let in the period 2024/25, there were only 67 affordable properties advertised in Haywards Heath Civil Parish⁹.

7.0 Matters in Agreement

⁵ MHCLG Live Tables

⁶ ONS Datasets

⁷ ONS Datasets

⁸ FOI Response (October 2025)

⁹ FOI Response (October 2025)

- 7.1 It is agreed that there is an acute national housing crisis and that the Council is also dealing with a housing crisis day to day, with a desperate need for more affordable housing to be provided in Mid Sussex District and Haywards Heath Civil Parish.
- 7.2 It is agreed at paragraph 5.6 of the overarching SoCG that the appeal site proposes to deliver 30% (24 affordable dwellings) of the total proposed number of homes as affordable homes which accords with the requirements of Policy DP30 and DP31 of the District Local Plan. Of the proposed 24 affordable dwellings, 75% will be for affordable/social rent and 25% as First Homes.
- 7.3 The parties agree that affordable housing can be secured by suitably worded planning obligations.
- 7.4 The parties agree that since the start of the District Plan period in 2014/15, once losses to stock through RtB are taken into account, the Council's gross completions figure of 2,883 falls to 2,855 affordable dwellings net of RtB over the 12-year period¹⁰.
- 7.5 The parties agree that the 2024 SHMA Update identifies an affordable housing need of 383 affordable rent or social rent per annum over the period between 2021 - 2040. In addition, it identifies a gross need for a further 311 affordable home ownership dwellings per annum, before any assessment of the potential supply is considered. Therefore, the annual need of 383 affordable dwellings per annum should be treated as a minimum.
- 7.6 As discussed at paragraph 6.6 of the overarching SoCG, it is agreed that the 2024 SHMA Update identifies a minimum need for 383 affordable dwellings per annum. This excludes the need for affordable home ownership. It is further agreed that, over the first five years of the 2024 SHMA Update period, there is already an average shortfall of -41 affordable dwellings per annum, equivalent to a total -205 over the period.
- 7.7 It is agreed that there has not been enough affordable homes built per year and there isn't sufficient affordable housing in Mid Sussex.
- 7.8 Due to the shortfall in delivery and current backlog of affordable housing, it is agreed that any calculations regarding the future supply of affordable housing should adopt the Sedgefield approach and seek to address the backlog within the next five years.
- 7.9 The parties agree that the affordability indicators cited at paragraph 6.1 of this Statement indicate that housing is becoming less affordable in Mid Sussex.

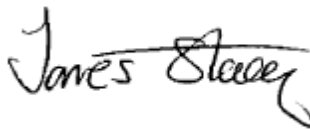
¹⁰ 2025/26 is a gross figure as RtB data not available at the time of writing

- 7.10 The parties agree that there is an on-going and pressing need for affordable housing in the District.
- 7.11 The parties agree that the provision of up to 24 much needed affordable dwellings at the appeal site accords with the sustainable development definition in NPPF and is a material consideration weighting in favour of this appeal, as a benefit that is likely to arise from the appeal proposal.
- 7.12 The parties agree that the weight to be given to the provision of affordable housing in the planning balance should be at the top end of the decision-maker's scale, which, for the Council, is substantial and for the Appellant is very substantial.

Signed on behalf of the LPA:

Signed on behalf of the Appellant:

Signature: 

Signature: 

Name: Joanne Fisher

Name: James Stacey

Date: 19 June 2026

Date: 19 June 2026