

## Matter 2. Housing supply and headroom

Issue 1: 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

### Anticipated housing supply over the plan period

2.1.1 We note that MS-TP2 updates the housing land supply thus:

	Submission Dec 23 2021 – 2039	Jan 2026 update 2021 – 2040	Notes
<b>Commitments (Existing allocations and Permissions)</b>	9,921	7,991	
<b>Completions 2021/22 – 2024/25</b>	2,240	4,324	Submission Plan was 2021/22 and 22/23 only
<b>Sustainable Communities</b>			
Of which Significant Sites (DPSC1 – DPSC7)	5,243	5,816	
DPSC1: West of Burgess Hill	1,350	1,350	
DPSC2: Land at Crabbet Park, Cophorne	1,500	1,950	Inclusion of Slingsby – see below and comments on Matter 7 DPSC2
DPSC3: Land to south of Reeds Lane Sayers Common	1,850	2,000	Additional year allows full allocation to be delivered – Submission Plan had 150 slip into next plan period
<b>Of which Housing sites DPSC4 - DPSC7</b>	543	516	DPSC6 = 20 less than allocation (80 rather than 100) and DPSC4 = 6 less than allocated (27 rather than 33 + 1 unit lost to deliver)
<b>Housing Sites DPA1- DPA17</b>	1,444	1,446	DPA3 has been increased by 75 but DPA12 removed as no promoter – so 90 removed And DPA7 reduced by 5 given promoter reps So overall difference of 20

	Submission Dec 23 2021 – 2039	Jan 2026 update 2021 – 2040	Notes
<b>Windfall allowance</b>	1,768	1,664	Remains same at 79dpa for small sites, 46dpa for larger sites and 25dpa from other sources
<b>Total Housing supply</b>	20,616 <b>2021-2039</b>	21,241 <b>2021- 2040</b>	

2.1.2 Taking each component part we would comment as follows:

a) Commitments (Existing allocations and Permissions)

2.1.3 Appendix 1 of MS-TP2 suggests this amounts to 7,991 and comprises 7,222 from large sites, 144 from small sites, and 125 from communal accommodation (ratio applied). Whilst not commenting on the latter two, we note that of the large sites there are a number that have yet to gain permission such as:

- Station yard/car park Burgess Hill – 200 dwellings
- The Brow, Burgess Hill – 100 dwellings
- St Wilfrid’s School Burgess Hill – 200 dwellings
- Imberhorne School, Windmill Lane, East Grinstead – 200 dwellings

2.1.4 These sites, as acknowledged in table 11 of MS-TP2 amount to over 1,000 dwellings i.e. over 10% of the commitments and whilst we note that the Council have suggested a 5% non-delivery rate we would question whether this is really realistic and would suggest that in order to assist the examination the Council provide further evidence from the promoters of these larger sites to help demonstrate that the 5% non-delivery rate i.e. just 52 dwellings is realistic. We would also suggest that in order to assist the examination MSDC set out clearly how the delivery of the land at Brookleigh (the north and north-west of Burgess Hill allocation in the adopted Local Plan - DP9) is to deliver the scale of development proposed within the timeframes set out in appendix 1 of MS-TP2.

b) Proposed allocations in the Submission Draft Local Plan

2.1.5 Wates have a direct interest in a number of the proposed allocations, including:

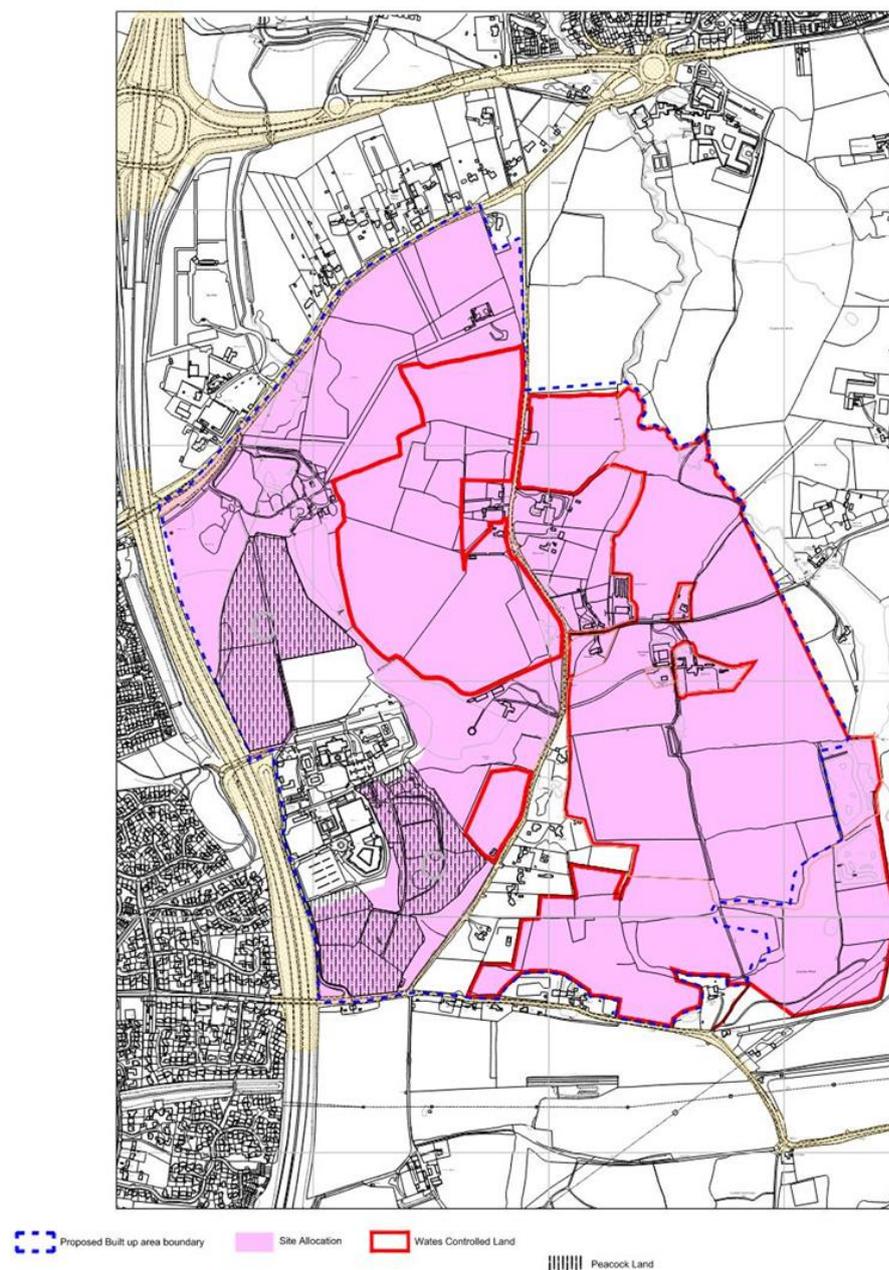
- DPSC2: Land at Crabbet Park, Copthorne
- DPSC7: Land at LVS Hassocks, Sayers Common
- DPA9: Land West of Turners Hill Road Crawley Down
- DPA10: Land at Hurst Farm Crawley Down
- DPA14: Land at Foxhole Farm, Bolney

2.1.6 Whilst detailed comments are provided on the land at **Crabbet Park** in association with Matter 7, and a SoCG is being prepared with MSDC to assist the examination in respect of Matter 7, in brief terms we can confirm for the purposes of Matter 2 that:

i) The majority of the land to the north, south and east as shown in Figure 1 below is promoted by Wates Developments Limited on the behalf of the landowners. Land to the

west was until recently owned and being promoted by Peacock 5 and has recently been sold to Slingsby Developments.

JA Matter 2 – Figure 1



ii) Wates are progressing a policy compliant mixed use application on the land within Crabbet Park that falls within their ownership; and liaising with Slingsby Developments to ensure a co-ordinated approach to masterplanning and infrastructure delivery across the allocation as a whole.

iii) Assuming 3 outlets on the Wates site and one on that controlled by Slingsby Developments, and noting their desire to also proceed at speed, we believe a realistic delivery rate to be as set out below, which would, as shown deliver an initial 65 dwellings within the first five years of the plan post adoption. Whilst this is faster than anticipated by MSDC who at para 3.19 of MS-TP2 have pushed deliver into years 6 onwards, we understand, and no doubt MSDC can explain, that their approach has been a precautionary one and is without knowledge of commercial commitments, a point acknowledged in the SoCG on Crabbet Park.

	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	40/41	Total
Wates	40	90	130	160	160	160	160	160	160	160	120	0	1,500
Slingsby	50	80	80	80	80	80	0	0	0	0	0	0	450
Total	90	170	210	240	240	240	160	160	160	160	120	0	1,950
Cumulative total	90	260	470	710	950	1,190	1,350	1,510	1,670	1,830	1,950	0	1,950
MSDC	0	100	150	200	200	225	225	225	225	225	175	0	1,950
MSDC Cumulative position	0	100	250	450	650	875	1,100	1,325	1,550	1,775	1,950	0	1,950

2.1.7 Turning to the other sites that Wates have an interest in, we can confirm:

DPSC7: Land at LVS Hassocks, Sayers Common

2.1.8 A hybrid application has recently been submitted for:

Demolition of all existing buildings bar the chapel, to retained for use within Use Class F and:

- a) Full planning permission for the development of the north western part of the Land at LVS Hassocks so as to accommodate a new SEN School with associated access from London Road, car parking, landscaping and drainage works; and
- b) Outline planning permission (Appearance, Landscaping, Layout and Scale Reserved) for the development of the rest of the land at LVS Hassocks so as to accommodate up to 210 dwellinghouses (including affordable housing) with associated access, car parking, landscaping, play areas, informal outdoor space and drainage works. Ref DM/26/0238

2.1.9 A PPA is also in place that looks to see this application reported to committee by May 2026, such that this we are confident delivery can commence within the 5 year period.

DPA14: Land at Foxhole Farm, Bolney

2.1.10 Outline planning permission was granted on 18th November 2025 for the erection of up to 200 residential dwellings, including affordable housing; a community building (use class F1) encompassing land for education provision, together with associated infrastructure. DM/25/1129 refers. The onward sale of the site to a housebuilder is nearing completion and

a reserved matters application is anticipated later this year. As such we are confident delivery can commence within the 5 year period.

DPA9: Land West of Turners Hill Road Crawley Down

2.1.11 This site has been promoted in two halves by Wates with outline permission granted on 5th September 2025 for:

Up to 150 dwellings, a care home (Use Class C2) up to 70 beds, and community facility, and associated infrastructure on Land West of Turners Hill Road and North of Huntsland Turners Hill Road Crawley Down. DM/25/0016 refers; and

Up to 200 dwellings, and associated infrastructure on land west of Turners Hill Road and south of Huntsland, Crawley Down. DM/25/0014 refers

2.1.12 Given comments made during the determination of DM/25/0016 concerning access via Wychwood; Wates have subsequently acquired an interest in the land at Hurst Farm (DPA10) and are now looking to submit an application imminently that will provide for 230 dwellings, a care home (Use Class C2) up to 70 beds, and community facility, and associated infrastructure on Land West of Turners Hill Road and North of Huntsland, including Hurst Farm, Turners Hill Road Crawley Down.

2.1.13 DPA 9 and DPA10 cumulatively provide for 387 dwellings. The above will provide for 430 dwellings a net increase of 43 dwellings.

2.1.14 The onward sale of the land south of Huntsland (DM/25/0014) to a housebuilder is nearing completion and a reserved matters application is anticipated later this year. It is hoped the revised development for the land north of Huntsland, including Hurst Farm will be consented by summer 2026 and that its onward sale will follow on swiftly thereafter. As such we are confident delivery can commence within the 5 year period.

2.1.15 Given the above we would suggest the following trajectory, the only part that differs from that advocated by MSDC being that associated with LVS, which is slightly quicker given contractual requirements and DPA10 as it has now merged in to that part of DP9 north of Huntsland. Red being the period beyond the 5 year period.

Site allocation ref	Wates Site name	25/26	26/27	27/28	28/29	29/30	30/31	31/32	Total
DPA9	CD South	0	0	50	50	50	50	0	200
DPA9 and DPA10	CD North (including DPA10)	0	0	50	50	50	50	30	230
DPA9	CD C2 equivalent	0	0	0	0	29	0	0	29
DPA14	Bolney	0	10	50	50	50	40	0	200
DPSC7	LVS	0	0	30	50	50	50	30	210

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

2.2.1 Tables 13 and 14 of MS-TP2 suggest a proposed headroom of 567 dwellings. The basis of the headroom figure is set out in table 13 and comprises:

- 5% non-delivery on the outstanding commitments that do not have planning permission –  $1,032 \times 5\% = 52$
- 5% non-delivery on the proposed District Plan allocations - excluding DPSC 2&3 as covered below =  $1866 + 1446 - 579 = 2,733 \times 5\% = 136$ . We note table 13 suggests this figure should be 140 but we believe it to be wrong and I have asked MSDC to review it
- Delayed delivery of DPSC2 and DPSC 3 by 1 year = 375
- $52 + 136 + 375 = 563$

2.2.2 As set out above we would question the 5% non-delivery on the outstanding commitments that do not have planning permission, and whilst we have no comments to make about the non-delivery on the proposed District Plan allocations, would also question, the delayed delivery of DPSC2 and DPSC3. That said, we note that the Site Allocations Development Plan Document (June 2022) at policy SA10 provided for an over-supply of 907 i.e. 5.5% of the plans requirement, whilst the over-supply proposed in MS-TP2 at 567 dwellings is only 2.74% of the requirement / 3.5% of the residual requirement (after completions). A comparable 5.5% would be 1,137 dwellings i.e. 570 more than currently provided for and would ensure resilience if required.

2.2.3 Looking at this in the context of our Matter 1 Statement, the alternative position would be the over-supply is just 239 dwellings i.e. 1.43% of the requirement / residual requirement (there being no completions in this context). A comparable 5.5% would be 917 dwellings i.e. 678 more than currently provided for and would ensure resilience if required.

2.2.4 Given the above if the contribution to unmet needs is to stay at 1,693 then the headroom needs to be increased by 570 under MSDC calculation or by 678 under the alternative calculation to ensure 5.5% headroom.

2.2.5 If the unmet need were to increase to 30% of CBC unmet need i.e. 2,251 which is an additional 558 more than proposed at present, then under MSDC scenario circa 1,168 dwellings would be needed to provide a 5.5% headroom or 948 under the alternative scenario

		MSDC	Notes	Alternative	
a	LHN	18,981	999dpa x 19	14,985	999dpa x 15
b	Unmet needs of CBC	1,693		1,693	
c	Housing requirement	20,674 1,088dpa		16,678 1,111dpa	
d	Overall supply	21,241	Includes completions 21/22 – 24/25	16,917	No completions
e	Surplus / Deficit	+567		+239	
f	Additions to achieve 5.5% headroom and retain current unmet need contribution	+570		+678	

		MSDC	Notes	Alternative	
g	Additions to achieve 30% Unmet needs contribution	+558		+558	
h	Additions to achieve 5.5% headroom and 30% unmet needs contribution	+1,168	18,981+2,251 = 21,232 x 5.5% = 1,167.76	+948	14,985+2,251 = 17,236 x 5.5%= 947.98

2.2.6 The above does not look to advocate either scenario, rather it highlights the various issues at play and the potential scale of the problem, having regard to the Secretary of States advise on pragmatism.

### The supply trajectory over the plan period

2.3.1 Whilst we have not seen a detailed supply trajectory covering the whole of the plan period so cannot comment upon this in any detail, as set out above our principal concern is the trajectory proposed for the land at Crabtree Park, which we believe to be overly cautious especially in light of the position agreed in the SoCG.

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

2.4.1 Taking each of these in turn we can confirm:

#### Delivery Impediments

2.4.2 There are no known impediments to delivery on any of Wates’ sites. All have been through a thorough due diligence process and none have been found to raise any issues that would delay delivery.

#### Lead In Times

2.4.3 Whilst table 3.2 of Lichfields Start to Finish Third Edition<sup>1</sup> suggests that it takes on average just over a year to obtain outline planning permission for a site of 100 – 499 dwellings, and 2.5 – 3 years to obtain outline planning permission for a site of circa 1,500 dwellings, this has not been our experience in Mid Sussex. Working with the Council through the pre app process and entering into PPA’s to manage the determination process we have obtained three outline planning consents considerable faster than suggested by Lichfields analysis, as set out below

Site ref	Location	Nos of dwellings	Validation date	Approval date	Time taken to determine
DPA9	South of Huntsland	200 dwellings	22nd January 2025.	5 <sup>th</sup> Sep 2025	7½ months
DPA9	North of Huntsland	150 dwellings + 7- bed care home	23 <sup>rd</sup> January 2025.	5 <sup>th</sup> Sep 2025	7½ months
DPA14	Foxhole Farm	200 dwellings	29th April 2025.	18 <sup>th</sup> Nov 2025	7 months

<sup>1</sup> Web link – [https://lichfields.uk/media/w3wjmw0/start-to-finish-3\\_how-quickly-do-large-scale-housing-sites-deliver.pdf](https://lichfields.uk/media/w3wjmw0/start-to-finish-3_how-quickly-do-large-scale-housing-sites-deliver.pdf)

JAA for Wates Developments Limited  
JAA ID: REP/43006977  
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2.4.4 Likewise Wates business model has facilitated onward sales within 6 months and purchasers are pursuing reserved matters applications in a similar way to ensure delivery well within the 5 year period, as set out above.

2.4.5 In addition to the above, and as set out in the SoCG on Crabbet Park, Wates and MSDC are committed to constructive joint working to bring forward and deliver the growth proposed at Crabbet Park. Indeed, joint working has already been a large factor in the preparation of the Submission Local Plan, the preparation of the SoCG and comprehensive masterplan for the site, and in progressing pre-application discussions. The latter has included negotiation on the preparation of a Planning Performance Agreement for DPSC2 to establish a clear and agreed framework, including responsibilities and timeframes, for the relevant parties, to take forward pre-application discussions in a positive and collaborative manner thus enabling the submission of a planning application for DPSC2 as soon as practically possible after the adoption of the Local Plan. As also set out in the SoCG it is anticipated that the PPA will be extended following submission through to determination and look to both parties to work towards an outline consent within 12 – 14 months of validation. Concurrently with the above, Wates will be looking to secure a development partner to take the site forward so as to secure delivery from 29/30

2.4.6 The above demonstrates that joint collaborative working can facilitate fast delivery, and MSDC have consistently demonstrated a willingness to work with those in the development industry to secure developments where they deem it appropriate to do so.

#### Build Out Rates

2.4.7 The build out rates proposed on all Wates sites are comparable to the average annual completions per outlet found at table 5.2 of Lichfields Start to Finish Third Edition (March 24); the average being 69 per outlet on sites with just one outlet, i.e. Bolney, Crawley Down and LVS, and an average of 164 per outlet on sites with three outlets i.e. Crabbet Park.

#### **The resilience of the plan**

2.5.1 As set out above the plan as now promoted in MS-TP2 encompasses a proposed headroom of 567 dwellings. We believe, notwithstanding the above that in order to ensure resilience a 5.5% buffer on the overall housing requirement should be provided and depending on the basis of the housing requirement this could range from 570 to over 1,100 dwellings.

#### **The 5 year housing land supply position at adoption**

2.6.1 We note that para 4.17 of MS-TPS2 suggests that as at 1st April 2025 MSDC can deliver a 5.37 year land supply, a surplus of 387 dwellings. This however is predicated upon the supply set out in appendix 4 of MS-TPS2, the stepped trajectory and adoption of the plan in 2026.

2.6.2 Whilst we comment on the matter of the stepped trajectory in our matter 1 statement and reserve our position on the matter of adoption in 2026, looking at the supply set out in appendix 4 we would question the following:

List A - Major sites (10+units) with full planning or reserved matters permission not yet commenced

- West Hoathly Brickworks, Sharpthorne - whilst various DoC applications have been submitted for this site, delivery remains slow and it would we believe be helpful if the Council provided a statement from Ashill (the developer) to demonstrate that the trajectory in App 4 is agreed.

List B - Major allocated sites with planning application submitted

- Land south and west Imberhorne Upper School East Grinstead – whilst this site benefits from outline planning permission, the RM has only just been submitted – DM/26/0131 refers. As such it would we believe be helpful if the Council provided a statement from Vistry and David Wilson Homes (the developers) to demonstrate that the trajectory in App 4 is agreed.
- Hurst Farm, Hurstwood Lane, Haywards Heath - whilst this site benefits from outline planning permission, no RM been submitted yet. As such we believe it would be helpful if the Council provided a statement from Homes England (the developers) to demonstrate that the trajectory in App 4 is agreed.

2.6.3 Whilst we have no reason to be believe these sites cannot come forward as suggested given the parties involved, for completeness we feel that given their size and other parties comments to date it would help the examination if this additional information could be provided.

2.6.4 This aside, the Council’s position on its 5 year supply would clearly be bolstered if they were to accept the inclusion of the Significant Sites in year 5 and/ or allocate additional small sites to help address any potential shortfall. As it stands a surplus of 387 dwellings (7.37%) is relatively fragile and could easily become a deficit if any of the larger sites were to fall short of what is anticipated. Looking to bolster this to circa 10% (525 dwellings) i.e. 137 more than proposed would be prudent and could be addressed by our comments on the matter of headroom.

2.6.5 In the context of the above, if the 5 year supply is assessed against the alternative housing requirement the position is:

	MSDC		Alternative	
Supply	5,632		5,632	
Requirement	5,245 (1049dpa)	999x 5 +5%	5,837 (1,167dpa)	16,678/15 = 1,111 x 5+ 5%
Surplus / deficit	+387		-205	
5 yrs supply	5.387		4.82	

2.6.6 Whilst the above could be used to suggest the stepped trajectory is required, we note that at in their report on the Uttlesford Local Plan<sup>2</sup>, the Inspectors accepted a plan that could only deliver 4.77yrs supply upon adoption, subject to certain caveats. Given the rolling 5

<sup>2</sup> see 52 – 56 of the Inspectors report - <https://www.uttlesford.gov.uk/LP-inspectors-report>

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year supply suggested in para 4.10 of MS-TP02 this be could be deemed to be appropriate here.

### **The ability to maintain a rolling 5 year housing land supply**

2.7.1 Whilst we note that in paras 4.19 and 4.20, and table 20 of MS-TP2 the Council suggest that they can demonstrate a rolling five year supply until year 10 on the assumption that a 5% buffer is added to the requirement and that there is no under delivery, we have not seen a detailed trajectory upon which this statement is made and as such are unable to comment upon it other than in the context of the deliverability of the sites which Wates have an interest in, as we have done above.