Tetlow King PLANNING

CD9.7a

Summary Affordable Housing Proof of Evidence of Mr James Stacey BA (Hons) Dip TP MRTPI

Colwell Farm, Haywards Heath

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

Colwell Farm, Haywards Heath

Miller Homes Ltd

June 2026

PINS REF: 6005786

LPA REF: DM/25/0445

OUR REF: 0203-02.M26.RPT

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Introduction

Section 1

1.1 My name is **James Stacey** and my credentials as an expert witness are summarised as follows:

- I hold a Bachelor of Arts (Hons) degree in Economics and Geography from the University of Portsmouth (1994) and a post-graduate diploma in Town Planning from the University of the West of England (“UWE”) (1997). I am a member of the Royal Town Planning Institute (“RTPI”).
- I have over 30 years professional experience in the field of town planning and housing. I was first employed by two Local Authorities in the South West and been in private practice since 2001.
- During my career I have presented evidence at more than 180 Section 78 appeal inquiries and hearings. I act for a cross-section of clients and advise upon a diverse range of planning and housing related matters.
- In December 2022 I was appointed as Managing Director of Tetlow King Planning. Prior to this I held the position of Senior Director. I was first employed by Tetlow King Planning in 2009.
- I have acted on a wide range of housing issues and projects for landowners, house builders and housing associations throughout the country. I have been actively engaged nationally and regionally to comment on emerging Development Plan Documents and Supplementary Planning Documents on affordable housing throughout the UK.

1.2 My Proof of Evidence examines the affordable housing need in Mid Sussex and considers the weight to be attributed to affordable housing in the overall planning balance.

1.3 In researching my evidence, I have placed reliance upon Freedom of Information (“FOI”) requests submitted to Mid Sussex on 28 August 2025 and 16 April 2026, seeking a range of information relating to affordable housing delivery. Partial responses were received from Mid Sussex in October 2025 and May 2026.

1.4 There is an acute need for more affordable homes to be delivered in Mid Sussex which the appeal proposals would make a substantial contribution towards addressing.

Affordable Housing Evidence

Section 2

2.1 This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision in light of the evidence of need in the Mid Sussex District area.

2.2 Outline planning permission is sought for up to 80 dwellings, of which 30% are proposed as affordable homes equivalent to up to 24 affordable. This level of provision meets the requirements of Policy DP31: Affordable Housing (30%) of the District Plan.

2.3 The tenure split would be policy compliant at 75% social rent (up to 18 units) and 25% First Homes (up to 6 units) in accordance with the requirements of Policy DPH8 of the District Plan.

2.4 The affordable housing provision will be secured through a Section 106 agreement.

Key Findings

Corporate Documents

2.5 Corporate documents identify the delivery of affordable housing as a high corporate priority of Mid Sussex. These include the following:

- Council Corporate Plan and Budget 2026 - 2027 (**CD6.9**);
- Homelessness Review 2019 (**CD6.11**); and
- Homelessness and Rough Sleeping Strategy 2020 – 2025 (**CD6.10**).

Affordable Housing Needs

2.6 There have been five Housing Market Assessments (including updates) which have been published over the past 11 years that form part of the evidence base for the adopted and emerging Mid Sussex District Plans. These are summarised on the table below:

Report	Monitoring Period	Annual Average Affordable Housing Needs (per annum)
Mid Sussex HEDNA (February 2015) **(CD6.13)**	2014-2031	223 (based on total Waiting List)
Mid Sussex HEDNA Update (November 2015) **(CD6.14)**	2014-2031	230 (based on total Waiting List)
Mid Sussex HEDNA Addendum (2016) **(CD6.15)**	2014-2031	272 (based on total Waiting List)
Mid Sussex SHMA (2021) **(CD7.6)**	2021-2038	925
Mid Sussex SHMA Update (2024) **(CD7.7)**	2021-2040	694

Source: Mid Sussex housing needs assessments published between 2015-2024

2.7 The most recent assessment of affordable housing need (SHMA Update 2024) identified a need for 694 affordable homes per annum.

2.8 This is made up of an identified need for 383 affordable rent or social rented properties per annum and 311 affordable home ownership properties per annum. The 2024 SHMA notes that needs for housing from those able to rent but not buy is less clear cut than identifying the need for affordable/social rent properties. Therefore, whilst the need for 383 affordable rent or social rented homes per annum would be the minimum level of affordable housing need, I consider that affordable home ownership is also part of the net annual need, so it is this combined figure of 694 affordable dwellings per annum which I take forward in my subsequent analysis.

Affordable Housing Delivery

2.9 The table below (Figure 6.8 of the main Proof) provides a summary of the affordable housing delivery against the various different identified affordable housing needs. The 2015 HEDNAs are only included in the table above as they are helpful in setting out the methodology for determining the affordable housing needs which is also carried forward into the 2016 HEDNA Addendum. Although all three are referred to in the Local Plan, as the 2016 HEDNA Addendum represents the most position underpinning the Local Plan, it is this need figure which is taken forward in subsequent assessments and analysis.

	Monitoring Period	Annual Averages AH Completions (Net of RtB*)	Annual Average Affordable Housing Needs	Annual Average Shortfall	Additions as a %age of Needs
2016 HEDNA Addendum	**2014-2031**	238	272	-34	87%
2021SHMA	**2021-2038**	342	925	-729	37%
2024 SHMA Update	**2021-2040**	342	694	-352	49%

*Source: Figures 6.3-6.7 of the AH Proof; *RtB data for 2025/26 not yet available so 2025/26 completions are gross*

2.10 What is clear is that already within the first five years of the 2024 SHMA Update monitoring period, there has already been a shortfall of -1,760 affordable dwellings (-352 per annum) since 2021/22.

Affordability Indicators

2.11 The following affordability indicators are material considerations and in this particular case demonstrate a worsening situation in Mid Sussex for any household seeking an affordable home:

Housing Register

- The Council's FOI response (**Appendix JS2**) confirms that on 31 March 2026 there were 2,613 households on the Housing Register. This is an increase from 2,468 households being on the Housing Register as of 31 March 2025 (**Appendix JS1**).
- Of the 2,613 households on the Housing Register, as of 14 May 2026, 672 households specified a preference for an affordable home in Haywards Heath Parish; this represents 26% of the Housing Register.
- The Council's FOI response (**Appendix JS1 and JS2**) shows that based on the dwelling size, successful applicants in the 2025/26 period experienced average waiting times ranging from 422 days (approximately 14 months) to 1,191 days (approximately three years and three months) for an affordable home.

Housing Register Bids and Lettings

- The Council's FOI response (**Appendix JS2**) confirms that of as of 14 May 2026 there were 672 households who specified a preference for an affordable home in Haywards Heath Civil Parish. This represents 26% of the total Housing Register (2,613 households).

- The Council's FOI response (**Appendix JS1 and JS2**) demonstrates that there were only 62 social homes advertised and only 67 social homes let over the 2024/25 monitoring period.

Temporary Accommodation

- The Council's FOI response (**Appendix JS2**) highlights that on 31 March 2026, there were a total of 43 households (outside and within the District) housed in temporary accommodation by the District.
- MHCLG data indicates that Mid Sussex spent £2,510,000 on temporary accommodation between 1 April 2024 and 31 March 2025.

Homelessness

- MHCLG statutory homelessness data shows that in the 12 months between 1 April 2024 and 31 March 2025, the Council accepted 197 households in need of homelessness prevention duty[1], and a further 324 households in need of relief duty[2] from the Council.

Private Rental Market

- ONS data shows that average (mean) private rents in Mid Sussex stood at £1,360 per calendar month ("pcm") in 2023/24. This represents a 42% increase from 2014/15 where average private rents stood at £960 pcm.
- It should also be noted that since the start of the 2024 SHMA Update period in 2021/22, average rents in Mid Sussex have increased by 23%.

Median House Prices

- The ratio of median house prices to median incomes in Mid Sussex now stands at **10.94**. A ratio of 10.94 in Mid Sussex stands substantially above the national median of 7.63 (+43%) and above the South East median of 9.58 (+14%).
- The median house price across Mid Sussex 008 MSOA has risen by 59% from £325,000 in 2014 to £517,000 in 2025. This figure is 73% higher than the England figure of £300,000, (which has seen an increase of 58% over the period), 35% higher than the South East figure of £384,000 (which has seen an increase of 61% over the period) and 19% higher than the Mid Sussex figure of £435,000 (which

[1] The Prevention Duty places a duty on housing authorities to work with people who are threatened with homelessness within 56 days to help prevent them from becoming homelessness. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
[2] The Relief Duty requires housing authorities to help people who are homeless to secure accommodation. The relief duty applies when a Local Authority is satisfied that an applicant is homeless and eligible for assistance.

has seen an increase of 61% over the period). This shows that Mid Sussex 008 MSOA are the least affordable amongst the comparison areas.

- Since the start of the 2024 SHMA Update period, median house prices in the Mid Sussex 008 MSOA have increased by 16% compared with the 8% in England, 6% in the South East and 7% in Mid Sussex. This demonstrates that not only are house prices in the MSOA significantly higher than the comparison areas, but they are also rising at a faster rate.

Lower Quartile House Prices

- For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the ratio of lower quartile house price to incomes in Mid Sussex in 2025 stood at **11.23.**
- The ratio in Mid Sussex stands substantially above the national average of 6.98 (+61%) and significantly above the South East average of 9.56 (+17%).
- It is also worth noting that mortgage lending is typically offered on the basis of up to 4.5 times earnings (subject to individual circumstances). Here, the affordability ratio is some 150% higher than that.
- When compared to the MSOA, The lower quartile house price across the Mid Sussex 008 MSOA has risen by 50% from £265,000 in 2014 to £397,000 in 2025. This figure is 97% higher than the national figure of £202,000, (which has seen an increase of 55% over the period), 39% higher than the South East figure of £340,000 (which has seen an increase of 64% over the period) and 17% higher than the Mid Sussex figure of £340,000 (which has seen an increase of 62% over the period). Again, this shows that even at the lower quartile level, the Mid Sussex 008 MSOA is the least affordable amongst the comparison areas.
- It should also be noted that since the start of the 2024 SHMA Update in 2021, the lower quartile house prices in Mid Sussex 008 MSOA have increased by 8%.

The Future Supply of Affordable Housing

2.12 Against the requirement to deliver 694 affordable homes per annum (2024 SHMA Update), in the first five years of the monitoring period the Council have overseen the delivery of 1,710 affordable homes (net of Right to Buy[3]) against a need of 1,915 net new affordable homes, which has resulted in a shortfall of -1,760 affordable homes,

[3] 2025/26 completions are gross as RtB not available at the time of writing

equivalent to -352 affordable homes per annum. This shortfall in my opinion should be addressed in the next five years as per the Sedgefield approach.

2.13 When the shortfall is factored into the 2024 SHMA Update identified need of 694 affordable homes per annum for the period 2026/27-2030/31, the number of affordable homes the Council will need to complete substantially increases to 1,046 net affordable homes[4] per annum over the five-year period 2026/27 to 2030/31.

2.14 If it were assumed that all sites in the Council's 5YHLS (5YHLS SoCG **CD8.3**) would provide policy-compliant levels of affordable housing, there is a possible supply of just 307 new affordable dwellings per annum. However, if it was assumed that the past gross affordable provision of 25% is to be continued over the next five years, this is likely to deliver only an average of 256 new affordable dwellings per annum.

2.15 Both these rates are substantially below the 1,046 per annum need figure when backlog needs are addressed in the first five years (in line with Sedgefield approach) and short of the identified need of 694 net affordable housing per annum identified in the 2024 SHMA Update. On any measure, the future supply of affordable housing in Mid Sussex is inadequate.

Conclusion

2.16 In light of the key findings of my evidence and the acute need for affordable housing within Mid Sussex, I consider that **very substantial weight** should be attributed to the delivery of up to 24 affordable homes through the appeal scheme in the planning balance.

[4] 352+694 = 1,046