

**Appeal by Fairfax Acquisitions Limited, The  
Norris Family and Mid Sussex District Council**

Land to the East of Ansty Way, Cuckfield Bypass,  
Cuckfield, West Sussex

Appeal Ref: 6002030

LPA Ref: DM/23/2866

**Summary Proof of Evidence – Affordable  
Housing Matters**

Annie Gingell (BSc (Hons) MSc MRTPI)

**May 2026**

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## **Client**

Fairfax Properties

## **Our reference**

05129

May 2026

# 1. Introduction

- 1.1 My name is Annie Gingell, and I am an Associate Director at **Turley**. I am instructed to present affordable housing evidence at this Inquiry by **Fairfax Acquisitions Limited and The Norris Family**, herein referred to as ‘the Appellant.’
- 1.2 This Appeal follows the refusal by Mid Sussex District Council (‘the Council’) of an outline planning application for up to 1,450 dwellings at Land to the East of Ansty Way, Cuckfield Bypass, Cuckfield, West Sussex (‘the Appeal Site’).
- 1.3 My evidence specifically addresses affordable housing provision and the weight to be attributed to this benefit in the planning balance, taking into account evidence of local needs and delivery as well as a range of other affordable housing need and affordability indicators.
- 1.4 It concludes that there is a genuine need for the proposed affordable homes now, and that **substantial positive weight**<sup>1</sup> should be attributed to the provision of affordable housing at the appeal site in the planning balance.
- 1.5 As part of my evidence, I have obtained and relied upon data from the Council through a Freedom of Information (FOI) request, available at **Appendix AG1** of my main Proof of Evidence.
- 1.6 The evidence which I have prepared and provide for this Appeal (PINS Reference No. 6002030) is true and has been prepared in accordance with the guidance of my professional institution. I confirm that the opinions expressed are true and professional opinions.

## Qualifications

- 1.7 I hold a Bachelor of Science (Hons) degree in City and Regional Planning from Cardiff University (2016) and a Master of Science degree in Spatial Planning and Development also from Cardiff University (2020).
- 1.8 I am a chartered member of the Royal Town Planning Institute (RTPI) with over 10 years professional experience in the field of town planning and housing.
- 1.9 I joined Turley in October 2024 as an Associate Director. Prior to joining Turley, I was an Associate Director at Tetlow King Planning, having joined the company in 2017 as a Graduate Planner. Prior to this I worked as a Planning Policy Officer in Local Government at Bristol City Council. During my undergraduate degree I worked as an Assistant Planner at Pegasus Group primarily on Section 78 appeals.
- 1.10 During my career, I have presented evidence at numerous Section 78 appeals in the West Midlands, North West, South West, South East, East of England, and London. I have acted

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<sup>1</sup> For clarity, the weightings I apply are as follows: none, neutral, very limited, limited, moderate, significant, very significant, substantial, and very substantial.

on a wide range of housing issues and projects for landowners, house builders, and housing associations throughout the country.

- 1.11 I also sit on the British Property Federation (BPF) Affordable Housing Committee, and I am a network leader for Neurodiversity in Planning (NiP) and a national co-Chair of Women in Planning (WiP).

## 2. Justification and Associated Benefits

### Introduction

- 2.1 Pursuant to Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004, when determining planning applications (and appeals) decision makers should first have regard to the relevant Development Plan as a whole, and then to any other material considerations.
- 2.2 Affordable housing serves a dual role in the planning process. It is both a Development Plan policy requirement and a material consideration. As a material consideration, the provision of affordable housing addresses wider societal needs, including housing affordability and social inclusion, thereby carrying weight in the planning balance.
- 2.3 In evaluating planning benefits (such as the provision of affordable housing) of a proposal, it is essential to recognise that compliance with policy, whether meeting or exceeding expectations, does not reduce a benefit's weight in the planning balance. Rather, the value of each benefit must be gauged on its own merits, considering the specific policy context and broader implications of the development.

### Affordable Housing Offer

- 2.4 The proposed development is for up to 1,450 dwellings, of which 30% (up to 435 homes) are to be provided on-site as affordable housing.
- 2.5 This level of provision meets the expectations of Policy DP31 of the Mid Sussex District Plan (2018) which seeks 30% provision from qualifying developments. The proposed tenure split of the affordable housing units is 75% Affordable Rent (up to 326 homes) and 25% First Homes (up to 109 homes).
- 2.6 As set out in Paragraph 12.33 of the Committee Report (**CD3.1**), the tenure split aligns with the requirements of District Plan Policy DP31. Paragraph 12.36 of the Committee Report goes on to confirm that the scheme would provide a policy compliant affordable housing provision.
- 2.7 The affordable housing provision will be secured through a Section 106 Planning Obligation.

### Policy Justification and Material Considerations

- 2.8 The proposed provision of up to 435 affordable homes is strongly justified in both policy and evidential terms. As set out throughout this Proof of Evidence, the scheme accords with the requirements of Policy DP31 of the Mid Sussex District Plan (2018), delivering a policy compliant level and tenure mix of affordable housing, whilst also directly responding to the substantial scale of affordable housing need identified across the District. The proposals therefore align with both Development Plan objectives and national policy support for significantly boosting the supply of affordable homes.

- 2.9 The policy support for the delivery of affordable housing must be considered in the context of the evidence base, which demonstrates that affordable housing need in Mid Sussex is both substantial and persistent. The Council's most recent evidence, the 2024 SHMA, identifies a net need for 694 affordable homes per annum across the District, equivalent to 13,186 affordable homes over the emerging Plan period. This represents a significant level of unmet need which substantially exceeds historic and projected rates of delivery.
- 2.10 Historic delivery has consistently failed to keep pace with identified need. Between 2021/22 and 2024/25, only 1,563 net affordable homes were delivered across Mid Sussex against a requirement for 2,776 affordable homes over the same period. This means that only 56% of identified need was met, resulting in a cumulative shortfall of 1,213 affordable homes in just four years. This is not a marginal or short term underperformance, but evidence of a sustained and structural failure to deliver sufficient affordable housing across the District.
- 2.11 The significance of that shortfall is not simply that delivery has been below needs in percentage terms, but that unmet need continues to accumulate year on year. As set out in Section 5 of my main Proof of Evidence, if the current shortfall is to be addressed over the next five years whilst also meeting newly arising need, the Council would need to achieve around 937 affordable homes per annum. This would represent a substantial increase above historic delivery rates and highlights the extent to which current provision is failing to meet identified needs.
- 2.12 The Council's own future supply evidence demonstrates that there is no realistic prospect of this position improving materially over the emerging Plan period. As set out in Section 7 of my main Proof of Evidence, the Council's trajectory indicates likely affordable housing delivery of around 317 affordable homes per annum over the next five years and around 286 affordable homes per annum over the remainder of the Plan period. Both figures fall substantially below identified need. On the basis of the Council's own trajectory assumptions, the cumulative affordable housing shortfall is projected to increase from 1,213 dwellings in 2024/25 to 7,178 dwellings by the end of the emerging Plan period in 2039/40, representing an increase of almost 500%.
- 2.13 In this context, the scale of affordable housing proposed by the appeal scheme is exceptional. The delivery of up to 435 affordable homes from a single development would represent around 63% of the annual affordable housing need identified in the 2024 SHMA. It would also exceed the total net affordable housing delivery achieved across the District in the most recent monitoring year and would represent the equivalent of more than a year of District wide affordable housing delivery based on recent completion rates. The proposals would therefore make a substantial and meaningful contribution towards addressing both existing backlog needs and newly arising affordable housing needs across Mid Sussex.
- 2.14 The consequences of this sustained under-delivery are not merely numerical but have direct and significant effects on households. In the appeal at Land at Sondes Place Farm, Westcott Road, Dorking (**CD11.3, p.16, [88]**), the Inspector observed at paragraph 88 that:

*“The consequences of not providing enough affordable homes affect people. Being able to access good housing has a bearing upon everyday life and there are socio-economic effects such as financial security and stability, physical and mental health, decreased social mobility and adverse effects on children’s education and development.”*

- 2.15 This observation is directly relevant to the position in Mid Sussex, where the persistent gap between delivery and need has resulted in a growing backlog of unmet need. As set out in this evidence this has manifested through increasing waiting times, sustained reliance on temporary accommodation, and limited access to suitable and affordable homes. It demonstrates that under-delivery gives rise to real and ongoing consequences for households across the District.
- 2.16 The importance of this contribution is heightened further by the Council’s inability to demonstrate a five year housing land supply. In these circumstances, paragraph 11d(ii) of the NPPF is engaged and is explicit that particular regard should be had to the provision of affordable housing. The Government’s recent Written Ministerial Statements and consultation draft NPPF further reinforce the central importance of affordable housing delivery in addressing what has been described as an “acute and entrenched” housing crisis.
- 2.17 Alongside this clear policy justification, the material considerations examined throughout Sections 4 to 7 of my main Proof of Evidence provide compelling evidence that affordable housing need in Mid Sussex is immediate and acute. There are currently 2,333 households on the Council’s Housing Register, representing a 29% increase since 2021. Waiting times for affordable housing extend to over 9 years for some 1 bedroom homes and more than 13 years for some 2 bedroom homes. At the same time, 101 households, including 89 children, are housed in temporary accommodation, whilst the Council spent £3,298,000 on temporary accommodation in 2024/25 alone.
- 2.18 These pressures are not abstract indicators but reflect the real world consequences of a sustained failure to provide sufficient affordable homes. The evidence demonstrates that households across the District are experiencing increasing barriers to accessing suitable housing, including prolonged periods in temporary accommodation, constrained access to family sized homes and worsening affordability pressures across both the rental and homeownership markets.
- 2.19 The appeal proposals directly respond to that context. They deliver a policy compliant level and tenure mix of affordable housing, provide a substantial quantum of affordable rented homes and affordable homeownership products, and would represent a significant increase in affordable housing provision in an area where delivery and turnover have historically been extremely limited.
- 2.20 Taken together, the Development Plan, national policy framework and material considerations point to a clear and consistent conclusion. Affordable housing need in Mid Sussex is substantial, persistent, and worsening, delivery has consistently fallen materially below identified needs, and the Council’s own future supply evidence demonstrates that this position is likely to deteriorate further over time. In these circumstances, the provision of up to 435 affordable homes at the appeal site represents a substantial and important planning benefit which should attract **substantial positive weight** in the planning balance.

## Conclusion

- 2.21 The affordable housing proposed by the appeal proposals is justified by both policy and evidence. It accords with the requirements of Policy DP31 of the Development Plan and directly responds to the scale of affordable housing need identified across Mid Sussex.
- 2.22 The analysis in Sections 4 to 7 of my main Proof of Evidence demonstrates that affordable housing need in Mid Sussex is substantial, persistent, and worsening. Historic delivery has consistently fallen below identified needs, future projected supply will continue to fall materially short of need, and the resulting shortfall is projected to increase significantly over the emerging Plan period. At the same time, the Housing Register, waiting time data, temporary accommodation figures, homelessness pressures, and market indicators all demonstrate that households across the District are already experiencing the consequences of this under delivery.
- 2.23 Against that background, the proposed delivery of up to 435 affordable homes is of exceptional importance. It would exceed the total net affordable housing delivery achieved across the District in the most recent monitoring year and would represent the equivalent of more than a year of District wide affordable housing delivery based on recent delivery rates. Locally, it would represent a substantial increase in affordable housing provision in an area where affordable housing delivery and turnover have historically been extremely limited.
- 2.24 The appeal proposals would therefore make a substantial and meaningful contribution towards addressing both existing affordable housing needs and the growing backlog of unmet need across the District. The affordable housing provided by the appeal proposals should accordingly be recognised as one of the principal benefits of the scheme and afforded **substantial positive weight** in the planning balance.

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