

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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Core Documents

CD Ref	Document
5.3	Mid Sussex District Plan 2014 – 2031
5.1	National Planning Policy Framework (adopted December 2024)
5.2	Draft National Planning Policy Framework (published December 2025)
22.5	Government's Housing White Paper "Fixing our Broken Housing Market" (February 2017)
16.3	Written Ministerial Statement: Further Support for Social and Affordable Housebuilding and Next Steps on Supported Housing (12 February 2025)
16.1	Written Ministerial Statement: Building the Homes We Need (30 July 2024)
16.2	Written Ministerial Statement: Building the Homes We Need (12 December 2024)
22.2	National Housing Strategy: Laying the Foundations – A Housing Strategy for England (November 2011)
22.3	House of Commons Debate (24 Oct 2013)
22.24	House of Commons Oral Evidence (20 Nov 2024)
22.19	Children's Commissioner Report "Bleak Houses: Tackling the Crisis of Family Homelessness in England" (August 2019)
22.20	Shelter Report "Denied the Right to a Safe Home – Exposing the Housing Emergency" (May 2021)
22.21	Shelter Report "Unlocking Social Housing: How to fix the rules that are holding back building" (April 2022)
12.1	Appeal Decision 3324631: Land at Sondes Place Farm, Westcott Road, Dorking (November 2023)
22.24	House of Commons: "Rising Cost of Living in the UK" Briefing Report (July 2024)
22.22	Shelter Report "Briefing: Cost of Living Crisis and the Housing Emergency" (September 2022)
22.25	MHCLG: A National Plan to End Homelessness (Dec 2025)
12.15	Appeal Decision 3349986: Brookfield Nursery, Ruishton Lane, Ruishton, Somerset (February 2025)
5.4	Mid Sussex Site Allocations DPD June 2022
5.5	Haywards Heath Neighbourhood Plan December 2016
7.1	Draft District Plan 2021 – 2039 (Regulation 19)
6.5	Position Statement 1: Delivering Sustainable Development in Mid Sussex (2025)
6.6	Position Statement 2: Infrastructure (2025)
6.3	Affordable Housing Supplementary Planning Document (2018)
6.9	Council Corporate Plan and Budget 2026 – 2027
6.11	Homelessness Review 2019
6.10	Homelessness and Rough Sleeping Strategy 2020 – 2025
6.13	Housing and Economic Development Needs Assessment (February 2015)
6.14	Housing and Economic Development Needs Assessment (November 2015)
6.15	Housing and Economic Development Needs Assessment Addendum (August 2016)
7.6	Strategic Housing Market Assessment 2021
7.7	Strategic Housing Market Assessment Update 2024
22.26	Housing Land Supply Monitoring Completions 2024/25
22.27	Housing Land Supply Monitoring Completions 2025/26
12.4	Appeal Decision 3230827: Oxford Brooks University, Wheatley (April 2020)

12.7	Appeal Decision 3278256: Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire (Jan 2022)
8.3	Five Year Housing Land Supply SoCG
7.3	Mid Sussex MS-TP4: Housing Post Hearings Update (May 2026)
3.2	Decision Notice (2025)
3.3	Planning Committee Report (2025)
10.1	LPA Statement of Case
8.1	Master SoCG with MSDC dated 16-05-2026
8.4	Affordable Housing SoCG with MSDC dated 19-06-2026
10.2	Mid Sussex Letter to PINS (June 2026)
11.1	Rule 6 Party Statement of Case
12.6	Appeal Decision 3136237 & 336233: Land to west of Langton Road, Norton (July 2016)
12.8	Appeal Decision 3282908: Land to the east of Highgate Hill and south of Copthall Avenue, Hawkhurst, Kent (March 2022)
12.16	Appeal Decision 3191477: Land east of Park Lane, Coalpit Heath, South Gloucester (Sept 2018)
12.17	Appeal Decision 3297487: Land at Witney Road, Ducklington (Jan 2023)
12.18	Appeal Decision 3329947: Land lying to the east of Hartfield Avenue and fronting on to Barnet Lane, Elstree, Hertfordshire (March 2024)
12.19	Appeal Decision 3303868: Land between Lodge Land and Burtons Lane, Little Chalfont, Amersham (March 2023)

Introduction

Section 1

- 1.1 This Affordable Housing Proof of Evidence has been prepared by **Mr James Stacey** of **Tetlow King Planning** on behalf of **Miller Homes Ltd**, in respect of a planning appeal at Colwell Farm, Haywards Heath.
- 1.2 The appeal is made against Mid Sussex Council (“the Council”) for its refusal of outline planning application DM/25/0445, at the above site.
- 1.3 The proposed development is for up to 80 dwellings, of which 30% (up to 24 dwellings) are to be provided on-site as affordable housing. This level of provision meets the requirements of Policy DP31 (30%) of the adopted Mid Sussex District Plan 2014-2031 (2018) (**CD5.3**).
- 1.4 Whilst the precise size and tenure breakdown will be agreed as part of the subsequent Reserved Matters application(s), the starting point will be based on a tenure split of 75% social/affordable rented and 25% First Homes which reflects the requirements of the District Plan. The proposed affordable housing will be secured by way of a Section 106 planning obligation.
- 1.5 This Proof of Evidence deals specifically with affordable housing and the weight to be afforded to it in this planning decision¹ considering evidence of need in the area. It should be read alongside the Appellant’s main Planning Proof of Evidence of Mr Nick Billington at SLR Consulting.
- 1.6 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”).

¹ For clarity, the weightings I apply are as follows: very limited, limited, moderate, significant, very significant, substantial, and very substantial.

- 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.

1.7 In accordance with the Planning Inspectorate's Procedural Guidance, I hereby declare that:

"The evidence which I have prepared and provide for this appeal in this Statement is true and has been prepared and is given in accordance with the guidance of the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions."

1.8 I further confirm that none of this evidence has been produced with the use of AI technology.

1.9 Providing a significant boost in the delivery of housing, and in particular affordable housing, is a key priority for the Government. This is set out in the most up-to-date version of the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance ("PPG"), the National Housing Strategy and the Government's Housing White Paper (**CD22.5**).

1.10 Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.

1.11 As part of my evidence, I have sought data from the Council, upon which I rely, through Freedom of Information ("FOI") requests submitted to Mid Sussex on 28 August 2025 and 16 April 2026. Partial responses were received in October 2025 and May 2026. The full FOI correspondence is attached at **Appendix JS1 and JS2**.

1.12 This proof of evidence comprises the following ten sections:

- Section 2 establishes the importance of affordable housing as an important material consideration;
- Section 3 considers the consequences of failing to meet affordable housing needs;
- Section 4 analyses the development plan and related policy framework including corporate documents;
- Section 5 sets out the identified affordable housing needs;
- Section 6 examines past affordable housing delivery against identified needs;
- Section 7 covers a range of affordability indicators;
- Section 8 considers the future supply of affordable housing;
- Section 9 sets out the council's assessment of the application;
- Section 10 identifies the benefits of the proposed affordable housing at the appeal site; and
- Section 11 considers the weight to be attached to the proposed affordable housing provision.

Affordable Housing as an Important Material Consideration

Section 2

Introduction

- 2.1 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 iterations of national planning policy, including the National Planning Policy Framework ("NPPF").

National Planning Policy Framework (12 December 2024) (CD5.1)

- 2.2 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.
- 2.3 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."* (My emphasis).
- 2.4 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.
- 2.5 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"* (my emphasis). 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.**

- 2.6 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.” (My emphasis).*

- 2.7 It should be stressed that 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.”*
- 2.8 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 (including Social Rent)...”* (My emphasis).
- 2.9 The NPPF places a core responsibility on 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.”*
- 2.10 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 (at least 20% below local market value) and rent to buy (which includes a period of intermediate rent).

Draft National Planning Policy Framework (16 December 2025) (CD5.2)

- 2.11 Between December 2025 and March 2026, the Government consulted on the draft NPPF, which proposed a continued and strengthened emphasis on boosting housing delivery, with particular regard to the provision of affordable housing. Whilst the draft NPPF may currently carry limited weight, the proposed direction of travel is a material consideration.
- 2.12 Section 6 discusses how the Government intends on 'delivering a sufficient supply of homes'. The Objective of the policies in that section is to *"support the delivery of a substantial increase in the supply of homes...by ensuring that a sufficient amount and variety of land can come forward where needed. This includes planning for an appropriate mix of accommodation for the local community and ensuring that land with permission is developed without unnecessary delay."* Clearly increasing housing supply significantly remains central to national policy, with a focus on ensuring that development contributes to meeting both overall housing need and the acute need for affordable homes.
- 2.13 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'*.
- 2.14 Draft Policy HO8: Providing affordable homes, establishes that development proposals are expected to *'meet or exceed up-to-date Development Plan requirements for the proportion and mix of affordable housing tenures relevant to the location'*. This reflects a continued focus in national policy on the importance of delivering affordable housing.
- 2.15 The fact that draft policy requires proposals to meet or exceed affordable housing policy requirements aligns with the Government's objective of *'delivering the biggest increase in social and affordable housebuilding in a generation'* (set out in Written Ministerial Statement February 2025 – **CD16.3**).

***"Building the Homes We Need"* Written Ministerial Statement (30 July 2024) (CD16.1)**

- 2.16 On 30 July 2024, the then Secretary of State, Angela Rayner MP, delivered a Written Ministerial Statement ("WMS") indicating the 'direction of travel' for the new Government's intentions for national planning policy.
- 2.17 The WMS set out the Government's aspirations to drive the delivery of affordable homes, stating that *"the Government are committed to the biggest growth in social and*

affordable housebuilding in a generation” and setting an objective to deliver 1.5 million homes during the current Parliament.

“Building the Homes We Need” Written Ministerial Statement (12 December 2024) - (CD16.2)

- 2.18 In a further WMS accompanying the publication of the revised NPPF, the Housing and Planning Minister, Matthew Pennycook MP, referred again to the Government’s objective to deliver 1.5 million homes during the current Parliament and made a series of stark observations in respect of housing costs, the use of temporary accommodation, and insufficient new housing coming forward:

“This Government has inherited an acute and entrenched housing crisis. The average new home is out of reach for the average worker, housing costs consume a third of private renters’ income, and the number of children in temporary accommodation now stands at a historic high of nearly 160,000. Yet just 220,000 new homes were built last year and the number of homes granted planning permission has fallen to its lowest in a decade.” (my emphasis)

“Further Support for Social and Affordable Housebuilding and Next Steps on Supported Housing” Written Ministerial Statement (12 February 2025) – (CD16.3)

- 2.19 Another WMS from Matthew Pennycook MP once again references the scale of the housing crisis, but places specific emphasis on affordable housing, alongside the ambition to *“deliver the biggest increase in social and affordable housebuilding in a generation”*:

“England is in the grip of an acute and entrenched housing crisis. The detrimental consequences of this disastrous state of affairs are now all pervasive. We have a generation locked out of homeownership; 1.3 million people languishing on social housing waiting lists; millions of low-income households forced into insecure, unaffordable and far too often sub-standard private rented housing; and 160,000 homeless children living in temporary accommodation.

Among the most important causes of the housing crisis is a failure over many decades to build enough homes of all tenures to meet housing demand and housing need.”

Planning Practice Guidance (March 2014, Ongoing Updates)

- 2.20 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. **Appendix JS3** sets out the paragraphs of the PPG of particular relevance to affordable housing.

Summary and Conclusions

- 2.21 This section clearly demonstrates that, within national policy, providing affordable housing has long been established as, and remains, a key national priority of successive Governments. It is a fundamental element in the drive to address and resolve the national housing crisis. That it has been part of Government policy for so long is indicative of the length of time over which there has been a deficiency in supply in the national housing market.

Consequences of Failing to Meet Affordable Housing Needs

Section 3

Introduction

- 3.1 The National Housing Strategy² sets out that a thriving housing market that offers choice, flexibility and affordable housing is critical to our social and economic wellbeing.
- 3.2 A debate took place in the House of Commons on 24 October 2013 concerning the issue of planning and housing supply (**CD22.3**). Despite the debate taking place over a decade ago the issues remain, and the commentary is sadly still highly pertinent to the issues surrounding affordable housing in Mid Sussex.
- 3.3 The former Planning Minister, Nick Boles, provided a comprehensive and robust response to the diverse concerns raised, emphasising the pressing need for more housing, and in particular affordable housing across the country. He opened by stating:

“I need not start by underlining the scale of the housing crisis faced by this country, the extent of the need for housing or the grief and hardship that the crisis is visiting on millions of our fellow citizens.”
- 3.4 When asked to clarify the word “*crisis*” by the MP for Tewkesbury, Nick Boles, commented that in the past year the percentage of first-time buyers in England who were able to buy a home without their parents’ help had fallen to the lowest level ever, under one third. He also commented that the first-time buyer age had crept up and up and was now nudging 40 in many parts of the country. He stated that the crisis “*is intense within the south-east and the south, but there are also pockets in parts of Yorkshire*”.
- 3.5 In response to questions, Nick Boles reaffirmed that:

“Housing need is intense. I accept that my hon. Friend the Member for Tewkesbury (Mr Robertson) does not share my view, but many hon. Members do, and there are a lot of statistics to prove it”.

² Laying the Foundations: A Housing Strategy for England (November 2011)

- 3.6 He went on to say: *“It is not unreasonable, however, for the Government to tell an authority, which is representing the people and has a duty to serve them, “Work out what’s needed, and make plans to provide it”. That is what we do with schools. We do not tell local authorities, “You can provide as many school places as you feel like”; we say, “Provide as many school places as are needed”. We do not tell the NHS, “Provide as many GPs as you feel you can afford right now”; we say, “Work out how many GPs are needed.” The same is true of housing sites: we tell local authorities, “Work out how many houses will be needed in your area over the next 15 years and then make plans to provide them.”*
- 3.7 Mr Boles’ full response highlighted the Government’s recognition of the depth of the housing crisis and continued commitment to addressing, in particular, affordable, housing needs. The final quote above also emphasised the importance of properly assessing and understanding the needs; and planning to provide for them.
- 3.8 Mr Boles indicates that there are *“a lot of statistics to prove it”*. My evidence in subsequent sections sets out an array of statistics, which I consider demonstrates that the crisis remains as prominent now as it did in 2013.
- 3.9 Moving forward over a decade and a new Government, we see even more alarming comments from the Housing Minister, Matthew Pennycook. On 20 November 2024 (**CD22.24**), the Minister addressed the Housing, Communities and Local Government Committee. He began with a powerful reminder:

“We have a generation now completely locked out of home ownership as a result of the steadily expanding gap between average house prices and average earnings. We have millions of low to middle-income households forced into insecure, unaffordable and far too often substandard private rented housing. We have 1.3 million people languishing on social housing waiting lists. To our utter shame as a nation—I say this everywhere I go—more than 150,000 homeless children right now are living in temporary accommodation. That is the price we have paid for not being serious about house building rates.”

- 3.10 He went on to say:

It is not just the lives it blights; it is also the impact on our economy. We are all suffering. The public services we rely on, for example, are harmed by the fact that we are consuming ever larger amounts of public money in the form of the rapidly rising housing benefit bill. The situation that we are in also hampers economic growth and productivity. It constrains the ability of our great towns

and cities to realise their full potential. We are taking decisive action to tackle the housing crisis and boost economic growth.

Consequences of Failing to Meet Affordable Housing Need

- 3.11 This section highlights some of the evidence gathered in recent years demonstrating the significant consequences of failing to meet affordable housing needs.
- 3.12 In August 2019 the Children's Commissioner produced a report titled *"Bleak Houses: Tackling the Crisis of Family Homelessness in England"* (CD22.19) to investigate the impact of homelessness and in particular the effect of this upon children.
- 3.13 The report identified that family homelessness in England today is primarily a result of structural factors, including the lack of affordable housing and recent welfare reforms³.
- 3.14 It stated that the social housing sector has been in decline for many years and that between the early 1980s and early 2010s, the proportion of Britons living in social housing halved, because of losses to stock through the Right to Buy and a drop in the amount of social housing being built.
- 3.15 The research found that the decline in social housing has forced many households, including families, into the private rented sector. High rents are a major problem: between 2011 and 2017 rents in England grew 60% quicker than wages. It stated that *"Simply put, many families cannot afford their rent. It is telling that over half of homeless families in England are in work"*.
- 3.16 The report particularly focused on the effect on children. The report revealed that many families face the problem of poor temporary accommodation and have no choice but to move out of their local area, which can have a *"deeply disruptive impact on family life"*. This can include lack of support (from grandparents for example) and travel costs.
- 3.17 It found that a child's education can suffer, even if they stay in the same school, because poor quality accommodation makes it difficult to do homework and that younger children's educational development can also be delayed.
- 3.18 Temporary accommodation also presents serious risks to children's health, wellbeing, and safety. This is particularly so for families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.

³ The Children's Commissioner Report references a National Audit Office Report titled 'Homelessness' (2017) which concludes that government welfare reforms since 2011 have contributed towards homelessness, notably capping, and freezing Local Housing Allowance.

- 3.19 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a “*significant impact on many aspects of their lives*”.
- 3.20 More recently, in May 2021, Shelter published its report “*Denied the Right to a Safe Home – Exposing the Housing Emergency*” (CD22.20) which sets out in stark terms the impacts of the affordable housing crisis. The report affirms that affordability of housing is the main cause of homelessness (page 15) and that “*we will only end the housing emergency by building affordable, good quality social homes*” (page 10).
- 3.21 In surveying 13,000 people, the research found that one in seven had to cut down on essentials like food or heating to pay the rent or mortgage. In addition, over the last 50 years the average share of income young families spend on housing has trebled. The following statements on the impacts of being denied a suitable home are also made in the report:

“Priced out of owning a home and denied social housing, people are forced to take what they can afford – even if it’s damp, cramped, or away from jobs and support networks.” (Page 5)

“... people on low incomes have to make unacceptable sacrifices to keep a roof over their head. Their physical and mental health suffers because of the conditions. But because of high costs, discrimination, a lack of support, and fear of eviction if they complain to their landlord, they are left with no other option.” (Page 5)

The high cost of housing means the private-rented sector has doubled in size over the last 20 years. [...] Most private rentals are let on tenancies of 6 to 12 months, and renters can be evicted for no reason because of section 21. This creates a permanent state of stress and instability. (Page 6)

If you live in an overcrowded home, you’re more likely to get coronavirus. If you live in a home with damp and black mould on the walls, your health will suffer. (Page 9)

“14% of people say they’ve had to make unacceptable compromises to find a home they can afford, such as living far away from work or family support or having to put up with poor conditions or overcrowding” (Page 12)

“Spending 30% of your income on housing is usually the maximum amount regarded as affordable. Private renters spend the most, with the average household paying 38% of their income on rent, compared to social renters (31%) and owner-occupiers (19%).” (Page 14)

“19% of people say their experiences of finding and keeping a home makes them worry about the likelihood they will find a suitable home in the future.” (Page 15)

“Families in temporary accommodation can spend years waiting for a settled home, not knowing when it might come, where it might be, or how much it will cost. It’s unsettling, destabilising, and demoralising. It’s common to be moved from one accommodation to another at short notice. Meaning new schools, long commutes, and being removed from support networks. Parents in temporary accommodation report their children are ‘often unhappy or depressed’, anxious and distressed, struggle to sleep, wet the bed, or become clingy and withdrawn.” (Page 25)

“Landlords and letting agents frequently advertise properties as ‘No DSS’, meaning they won’t let to anyone claiming benefits. This practice disproportionately hurts women, Black and Bangladeshi families, and disabled people.” (Page 29)

“The situation is dire. A lack of housing means landlords and letting agents can discriminate knowing there is excess demand for their housing.” (Page 30)

3.22 Shelter estimate that some 17.5 million people are denied the right to a safe home and face the effects of high housing costs, lack of security of tenure and discrimination in the housing market (Page 32).

3.23 The Report concludes (page 33) that for change to happen, *“we must demand better conditions, fight racism and discrimination, end unfair evictions, and reform housing benefit. But when it comes down to it, there’s only one way to end the housing emergency. **Build more social housing**”* (emphasis in original).

3.24 In April 2022 Shelter published a further report titled *“Unlocking Social Housing: How to fix the rules that are holding back building” (CD22.21)*. The first paragraph of the Executive Summary is clear that:

“Our housing system is broken. Across the country, renters are stuck in damp, crumbling homes that are making them sick. Private renters are forced to spend more than 30% of their income on rent. As a result, nearly half have no savings.

Desperate parents fighting to keep a roof over their heads are forced to choose between rent and food.”

3.25 The Executive Summary goes on to state that **“An affordable and secure home is a fundamental human need”** (emphasis in original) noting that one in three of us don’t have a safe place to call home and that finding a good-quality home at a fair price is impossible for so many people.

3.26 At page 6 the report considers the impacts of the Government plans to scrap developer contributions (Section 106 – s106) and replace it with a flat tax called the ‘infrastructure levy’. It states that:

“This would mean that developers no longer build social housing on site, in return for planning permission, but instead pay a tax to the local council when they sell a home. The unintended consequence could add yet more barriers to social housebuilding and spell the end of mixed developments where social tenants live alongside private owners.” (My emphasis).

3.27 In considering the impact of the PRS the report highlights at page 7 that nearly half of private renters are now forced to rely on housing benefit to pay their rent – *“That’s taxpayer money subsidising private landlords providing insecure and often poor-quality homes.”* The paragraph goes on to note that:

“The lack of social housing has not just pushed homeownership out of reach; it’s made it nearly impossible for working families to lead healthy lives and keep stable jobs. Poor housing can threaten the life chances and educational attainment of their kids. If we want to level up the country, we must start with home.”

3.28 Regarding the temporary accommodation (“TA”) the report notes on page 10 that number of households living in such accommodation has nearly doubled over the last decade and the cost to the taxpayer has gone through the roof. The page also notes that *“TA cost councils £1.45bn last year (2020/21). 80% of this money went to private letting agents, landlords or companies.”*

3.29 Page 11 goes on to highlight that *“Of the nearly 100,000 households living in TA, more than a quarter (26,110) of these households are accommodated outside the local authority area they previously lived in.”* This means that *“Families have been forced to endure successive lockdowns in cramped, unhygienic, and uncertain living conditions, away from jobs, family, and support networks.”*

- 3.30 The page goes on to conclude that *“As a result, the national housing benefit bill has grown. Tenants' incomes and government money is flowing into the hands of private landlords, paying for poorer quality and less security. **There are now more private renters claiming housing benefit than ever before.**”* (emphasis in original).
- 3.31 Page 9 is also clear that *“Since 2011, freezes to Local Housing Allowance (housing benefit for private renters) and blunt policies like the benefit cap have been employed to limit the amount of support individuals and families can receive. As a result, many thousands of renters' housing benefit simply doesn't meet the cost of paying the rent.”*
- 3.32 In considering the consequences of this page 12 notes that *“With fast growing rents, mounting food and energy bills, and a dire shortage of genuinely affordable social housing, these policies have failed to curb the rising benefits bill. Instead, they have tipped people into poverty, destitution and homelessness.”*
- 3.33 Finally, page 21 is clear that:
- “For the over 1 million households on housing waitlists across England, who in the current system may never live with the security, safety, and stability that a good quality social home can provide, reforms cannot come any faster. Access to good housing affects every aspect of one's life and outcomes like health, education, and social mobility. More to the point, the outcomes and holistic wellbeing of an individual or an entire household is not only meaningful for their trajectory but also contributes to the threads of society by helping people contribute to their communities.*
- The evidence is clear, the financial requirements to own one's home are out of reach for many. And many will spend years stuck in a private rented sector that's not fit for purpose. The answer is clear: build many more, good quality social homes for the communities that so desperately need them.”* (My emphasis).
- 3.34 The consequences of failing to provide enough affordable homes were also recognised by the Inspector in a recent decision in Mole Valley where I provided affordable housing evidence. Inspector McGlone (**CD12.1, p.16, [88]**) was clear at paragraph 88 of his decision 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. In Mole Valley the number of people on the housing register has*

risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent.”

- 3.35 It is also pertinent to highlight that Mid Sussex themselves recognise the consequences of failing to meet affordable housing needs, as identified in a number of the Council’s Corporate Documents discussed at paragraphs 4.34 – 4.50 of this Proof.

The Cost-of-Living Crisis

- 3.36 On 11 July 2024, the House of Commons published its ‘Rising Cost of living in the UK’ briefing report (**CD22.24**) which highlights the affordability of goods and services for households.

- 3.37 The briefing report details at Section 5.1 that *“during the period 22 May to 2 June 2024, 54% of adults in Great Britain reported an increase in their cost of living compared to the previous month”*. Moreover, Section 5.1 further specifies that *“58% of those who reported a rise in their cost of living said they were spending less on non-essentials as a result, while 40% reported using less energy at home and 37% report cutting back on essentials like food shopping, 3% were being supported by a charity, including food banks”*.

- 3.38 Additionally, page 52 of the House of Commons report recognises that renting in the private sector is becoming more unaffordable to people receiving benefits.

- 3.39 Shelter published a briefing report in September 2022 titled ‘*Briefing: Cost of Living Crisis and the Housing Emergency*’ (**CD22.22**) which further explains the private rented sector problem on page one:

“LHA which determines the amount of housing benefit private renters receive has been frozen since March 2020 while private rents have risen 5% in England – and even more in some parts of the country. The freeze has left low-income private renters in an incredibly precarious position. 54% of private renters claiming housing benefit have a shortfall to their rent.” (My emphasis).

- 3.40 The Shelter briefing sets out that low-income households (including those at risk of homelessness) have no choice but to turn to the private rented sector due to a severe shortage of affordable housing and concludes on page two that *“the only sustainable solution is to address the causes of the housing emergency by investing in truly affordable social homes”*.

The Cost of Temporary Accommodation

- 3.41 In my opinion the cost of temporary accommodation is an important material consideration in the determination of this appeal.
- 3.42 BBC News reported on 13 October 2023 that English Councils spent more than £1.7bn on temporary accommodation for homeless people in the 2022/23 financial year (**Appendix JS4**). In my opinion this is a significant cost arising primarily as a consequence of a lack of affordable housing to adequately house people in need.
- 3.43 The article highlighted that the figure, published by the Ministry of Housing, Communities and Local Government ("MHCLG"), has increased by around 9% from the previous year. B&B accommodation alone in 2022/23 accounted for almost £500m in gross costs, increasing by a third on the previous year.
- 3.44 Shelter's chief executive Polly Neate was quoted in the article, stating that the amount spent on temporary accommodation was not only *"outrageous, but it's also illogical"*. She went on to say that:
- "We simply can't keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home. [...]"*
- This decision combined with the decades of failure to build enough social homes has meant that families can't find anywhere affordable to live and as a result are forced into homelessness in cramped and unsuitable temporary accommodation, often miles away from their children's schools and support networks."* (Emphasis added)
- 3.45 Inside Housing reported in October 2023 that homelessness in England is continuing to increase, with figures published in July 2023 showing the number of people in temporary accommodation was at a record high and that the number of children in this situation is also at the highest level since records began in 2004.
- 3.46 On the 5 March 2024 MHCLG published data on the age of children under ten in temporary accommodation. The study found that there were 86,945 children under the age of ten living in temporary accommodation at the 30 June 2023, with 19,430 of these children less than 12 months old.
- 3.47 The Inside Housing article also highlighted that the growing cost of temporary accommodation is putting local authorities' budgets under strain. It noted that that Hastings Borough Council recently faced bankruptcy, partly due to its large

expenditure on temporary accommodation, which had risen to £5.6m per year, compared with £730,000 in 2019.

- 3.48 The report added that London councils are expected to overspend on temporary accommodation by £90m this year.
- 3.49 In December 2023, ITV News reported that almost one in five council leaders in England expect to issue Section 114 notices⁴ in 2024.
- 3.50 On the 23 January 2024, ITV News reported that the increasing cost of housing homeless people in temporary accommodation is putting local authorities on the brink of financial ruin.
- 3.51 The ITV News article added that according to homelessness charity Crisis, some 298,430 households approached their local council for homelessness support in the past year. Jasmine Basran, head of policy and campaigns at Crisis, said:

"Crippling financial pressures from rising living costs, unaffordable rents and a severe lack of social homes is forcing more and more people into homelessness."
(Emphasis added)

- 3.52 The ITV News article continued, adding that Eastbourne Borough Council ("EBC") is currently spending 49p of every £1 on temporary accommodation for homeless people. Stephen Holt, the leader of EBC said ministers must "recognise the gravity of this situation" and work out how to resolve it "before it is too late", adding that:

"Simply put, without government intervention to tackle the tremendous cost of temporary accommodation and homelessness, the next step for many councils of all stripes is emergency budgets and section 114 notices."

- 3.53 A further article from Inside Housing on 24 January 2024 reported that the surge in spending on temporary accommodation could spell the "end of local government".
- 3.54 The article highlighted that Councillors from across the political spectrum had expressed serious concerns over temporary accommodation spending at an emergency meeting in Westminster on 23 January 2024 where more than 50 local leaders met to discuss the "national crisis" caused by the cost of temporary accommodation.

⁴ A section 114 notice means the council cannot make new spending commitments and must meet within 21 days to discuss what to do next.

- 3.55 Unfortunately, it appears that the situation has not improved and has actually got worse. Shelter issued a Press Release on 18 September 2025 reporting that the bill for homelessness accommodation “soars by 25% hitting £2.8bn” for the period 2024/25 (**Appendix JS5**). This is compared to the £1.7bn which the BBC News reported in October 2023 for the period 2022/23 (see paragraphs 3.42-3.43 above). The MHCLG ‘A National Plan to End Homelessness’ (**CD22.25**) noted that the £2.8bn of Government spending on temporary accommodation (in 2024/25) is five times higher than in 2010 (page 7).
- 3.56 The plan noted (on page 11) that there is a record 132,410 households, including 172,420 children living in temporary accommodation in England⁵. It goes on to highlight that *“whilst some temporary accommodation is of decent quality, much is not. At the worse extreme, 2,070 families are currently living in B&B-type accommodation and hostels beyond the 6-week statutory limit. This is both unlawful and deeply damaging”* (page 11).
- 3.57 Furthermore, in the Shelter Press Release, Mairi MacRae, Director of Campaigns and Policy at Shelter, echoes the comments previously made by Shelter’s Chief Executive Polly Neate (BBC News Article, 13 October 2023 – see paragraph 3.44) stating:
- “While the housing emergency is draining billions in public funds, families across the Country are paying the ultimate price. Money that should be helping them into a secure home is instead shelled out on grim temporary accommodation, just to keep people of the streets”.*
- 3.58 I agree that the cost of housing people in affordable housing is spiralling out of control. I also agree with Polly Neate, and more recently, Mairi MacRae that, *“money that should be helping them [families in need] into a secure home is instead shelled out on grim temporary accommodation, just to keep people off the streets”.*
- 3.59 In allowing an appeal at Brookfield Nursery, Ruishton Lane, Ruishton, Somerset (**CD12.15**) in February 2025, the Inspector considered the reduction in expenditure on bed and breakfast accommodation for those in temporary accommodation to be a significant benefit of that appeal scheme. Paragraph 64 of the decision states the following:
- “64. Out-of-date settlement boundaries aside, the development would be consistent with the Council’s overall spatial strategy to focus development in*

⁵ 12 MHCLG (2025) Statutory Homelessness in England, available: Statutory Homelessness in England: April to June 2025 - GOV.UK

*the most accessible and sustainable locations. **Other significant benefits include...***

Savings to a Council that has declared an economic emergency through a reduction on B&B expenditure for those in temporary accommodation” (My emphasis).

3.60 The Inspector went on to state in paragraph 65 that:

“irrespective of the competing submissions on housing land supply, the largely undisputed social, economic and environmental benefits listed about are of such magnitude that they clearly outweigh the identified harms and associated policy conflicts”.

3.61 Therefore, the provision of affordable housing as part of the appeal scheme, will assist Mid Sussex in being able to reduce spend on temporary accommodation, which as in the Ruishton decision above, should be seen as a significant benefit.

Summary and Conclusions

3.62 Evidently, the consequences of failing to meet affordable housing needs in any Local Authority are significant. Some of the main consequences of households being denied a suitable affordable home have been identified as follows:

- A lack of financial security and stability;
- Poor impacts on physical and mental health;
- Decreased social mobility;
- Negative impacts on children’s education and development;
- Reduced safety with households forced to share facilities with those engaged in crime, anti-social behaviour or those with substance abuse issues;
- Being housed outside social support networks;
- Having to prioritise paying an unaffordable rent or mortgage over basic human needs such as food (heating or eating); and
- An increasing national housing benefit bill.

3.63 These harsh consequences fall upon real households and unequivocally highlight the importance of meeting affordable housing needs. These are real people in real need.

An affordable and secure home is a fundamental human need, yet households on lower incomes are being forced to make unacceptable sacrifices for their housing.

- 3.64 I am strongly of the opinion that a step change in the delivery of affordable housing is needed now.
- 3.65 The acute level of affordable housing need in Mid Sussex coupled with worsening affordability, will detrimentally affect the ability of people to lead the best lives they can. The National Housing Strategy requires urgent action to build new homes, acknowledging the significant social consequences of failure to do so.

The Development Plan and Related Policies

Section 4

Introduction

- 4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the application should be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 4.2 The relevant Development Plan in respect of affordable housing for the appeal site currently comprises the adopted Mid Sussex District Plan 2014-2031 (March 2018) ("DP"), (**CD5.3**), Site Allocations Development Plan Document ("DPD") (June 2022) (**CD5.4**) and Haywards Heath Neighbourhood Plan (December 2016) ("NP") (**CD5.5**).
- 4.3 Other material considerations relevant to affordable housing include the NPPF (2024) and the consultation draft NPPF (2025), the PPG (March 2014, ongoing updates), emerging Local Plan (at the time of writing the Draft District Plan 2021 – 2039 was at Examination) (**CD7.1**), Position Statement 1: Delivering Sustainable Development (December 2025) (**CD6.5**), Position Statement 2: Infrastructure (**CD6.6**), Affordable Housing Supplementary Planning Document (SPD) (2018) (**CD6.3**), and a number of corporate documents which support the provision of affordable housing at the corporate level.

The Development Plan

Mid Sussex District Plan 2014 - 2031 (2018) – CD7.1

- 4.4 The Mid Sussex District Plan 2014-2031 was adopted in March 2018 and provides the strategic vision for the location of new development in Mid Sussex, including new homes and policies controlling the provision of affordable housing.
- 4.5 A key objective of the District Plan is to tackle the issue of housing affordability within the District, as Cllr Andrew MacNaughton states in the foreword:

"housing is relatively unaffordable to many with high numbers of people travelling outside of the district for work. The District Plan makes provision for more homes and jobs, to make homes more affordable and accessible to enable people to live and work in the district".

- 4.6 Of the key issues faced by the District listed at paragraph 2.9 of the District Plan, house prices are acknowledged to be high relative to incomes, with affordability issues faced particularly by younger people.
- 4.7 At paragraph 3.10, the District Plan outlines the housing evidence upon which it is based, including the Mid Sussex Housing and Economic Development Needs Assessment (“HEDNA”) (February 2015, updated in November 2015) and its Addendum (August 2016). The HEDNA and its subsequent updates were based upon the evidence contained in the 2009 and 2012 Strategic Housing Market Assessments (“SHMAs”), as well as the 2014 Affordable Housing Needs Update (“AHNU”).
- 4.8 **Policy DP28** on page 78 requires 4% of affordable dwellings to be built to Building Regulations M4(3), suitable for wheelchair users. This figure is dependent on the suitability of each individual site, and the need at the time.
- 4.9 **Policy DP30** on page 82 outlines the District’s requirements for housing mix on new residential developments. To support sustainable communities, it requires housing development to provide a mix of dwelling types and sizes from new development (including affordable housing) that reflects current and future local housing needs. Evidence of local need will be based on the best available evidence, including evidence provided to support Neighbourhood Plans.
- 4.10 **Policy DP31** at page 103 covers the affordable housing requirements for new residential developments within the District. The policy is included in full below (emphasis added).

DP31: Affordable Housing

The Council will seek:

1. The provision of a **minimum of 30% on-site affordable housing for all residential developments providing 11 dwellings or more**, or a maximum combined gross floorspace of more than 1,000m²;
2. For residential developments in the High Weald Area of Outstanding Natural Beauty providing 6-10 dwellings, a commuted payment towards off-site provision, equivalent to providing 30% on-site affordable housing;
3. On sites where the most recent use has been affordable housing, as a minimum, the same number of affordable homes should be re-provided, in accordance with the current mix and tenure requirements;
4. **A mix of tenure affordable housing, normally approximately 75% social or affordable rented homes, with the remaining 25% for intermediate homes**, unless the best available evidence supports a different mix; and
5. Free serviced land for the affordable housing.

All affordable housing should be integrated with market housing and meet national technical standards for housing including “optional requirements” set out in this District Plan (Policies DP27: Dwelling Space Standards; DP28 Accessibility and DP42: Water Infrastructure and the Water Environment); or any other such standard which supersedes these.

Proposals that do not meet these requirements will be refused unless significant clear evidence demonstrates to the Council’s satisfaction that the site cannot support the required affordable housing from a viability and deliverability perspective. Viability should be set out in an independent viability assessment on terms agreed by the relevant parties, including the Council, and funded by the developer. This will involve an open book approach. The Council’s approach to financial viability, alongside details on tenure mix and the provision of affordable housing will be set out in a Supplementary Planning Document.

The policy will be monitored and kept under review having regard to the Council’s Housing Strategy and any changes to evidence of housing needs.

- 4.11 With regards to monitoring indicators, these are included for each policy on pages 102 to 110. For policy DP31, it states that the indicators for affordable housing provision will be the ‘*number of affordable homes completed annually (gross)*’, and ‘*financial contributions towards housing provision*’. In relation to the target the Council should achieve, this is stated as: ‘*maximise in compliance with DP31: Affordable Housing*’.

Haywards Heath Neighbourhood Plan 2014 - 2031 (2016) - **CD5.5**

- 4.12 The Haywards Heath Neighbourhood Plan: Our Bright Future (“NP”) document was prepared by the Haywards Heath Town Council and was formally made in December 2016.
- 4.13 It is important to note that on pages 35- 44, the NP discusses Objective 9A: To make provision for new housing within the Plan area. However, the supporting text provides only a high-level acknowledgement of housing need and does not translate this into a robust or policy-led strategy for meeting either overall or affordable housing requirements.
- 4.14 The NP does not identify an affordable housing needs figure for Haywards Heath, nor are there any policies which identify a specific percentage of affordable housing dwellings to be delivered on site as part of new residential developments.

Other material considerations

Emerging Mid Sussex District Plan Review 2021 – 2039 – **CD6.1**

- 4.15 Mid Sussex is currently undertaking a District Plan Review which will supersede their current District Plan upon adoption.

- 4.16 In December 2025, a new Inspector was appointed, and hearings have taken place between March and April 2026. In May 2026, in response to the Local Plan Inspectors request for the Council to increase the planned number of houses to support the unmet needs of adjacent Authorities (namely Crawley and Brighton and Hove), a long list of additional sites (subject to in-combination testing) has been identified which includes the appeal site. Additional assessment and further consultation will now take place on these identified sites.
- 4.17 Notwithstanding the above, the draft Plan in the section “Social Characteristics and Challenges” at bullet point 13 (page 16) identifies that one of the social challenges facing the District is the fact that *“the need for affordable homes is not met by existing or planned supply”*. It goes on to state at the following bullet point 17 that *“there is a need for affordable housing in Mid Sussex where house prices are high compared to incomes”*.
- 4.18 Emerging ‘Policy DPH7’ on page 147 outlines the intended housing mix principles for the District, with one of its purposes stated as being *“this policy seeks to ensure that the right size and mix of housing (including affordable housing) is provided within the district”*. It sets out the following mix requirement for affordable ownerships and rented units, which is based on the 2021 SHMA (although it is noted that the recommended size and tenure mix remains the same in the latest 2024 SHMA update (table 5.5 of the 2024 SHMA Update)):

Tenure	1-bed/2-person	2/bed/4-person	3-bed/5-person	4+bed/6-person
Affordable Ownership	10-15%	50-55%	25-30%	5-10%
Affordable Rented	30-35%	40-45%	15-20%	5-10%

- 4.19 Emerging ‘Policy DPH8’ outlines the requirement to provide 25% First Homes, with the remaining 75% of the tenure split being provided as affordable rent. The policy text confirms that the Council will continue to seek 30% on-site affordable housing on developments of 10 dwellings or more (6 – 9 if within the AONB), or with a combined gross floorspace greater than 1,000m², and also carries forward the 4% requirement for M4(3) accessible units.
- 4.20 Emerging ‘Policy DPH9’ on page 154 sets out the 25% requirement for First Homes as part of the affordable tenure split, stating the Government’s May 2021 Written Ministerial Statement and amended PPG as reasons for its inclusion.

Position Statement 1: Delivering Sustainable Development in Mid Sussex (December 2025) – CD6.5

- 4.21 As the Position Statement has been approved by the Council, the decision making principles are material considerations in the determination of planning applications.
- 4.22 With regards to affordable housing, Principle 7 requires all residential developments providing 10 or more dwellings (or having a site area of 0.5ha or more) to provide a minimum of 30% onsite affordable housing. Within the High Weald National Landscape (AONB), developments providing 6-9 dwellings should provide the minimum 30% affordable housing.
- 4.23 In terms of mix, the starting point for the current and future housing mix needs are evidenced in the SHMAs and variations to these will need to be agreed with the Council.

Position Statement 2: Infrastructure (December 2025) – CD6.6

- 4.24 It is noted that the Development Infrastructure and Contributions SPD (2018) have been revoked. Position Statement 2: Infrastructure has since been endorsed by the Council and forms a material consideration in the determination of planning applications.
- 4.25 At paragraphs 4.8 and 4.9 of Position Statement 2, the Council recognises that affordable housing generates a lower level of additional demand on certain infrastructure and community services stating that:

“4.8 Many affordable housing occupants already live in the same area as proposed new affordable housing development and residents of new affordable housing in the district are therefore already using the services provided. As a result, and in accordance with the methodology implemented by West Sussex County Council, a 33% reduction of the additional population from all social units is applied due to the number of concealed households moving into the development. This discount will be applied to all affordable housing units provided by Registered Providers, regardless of tenure.

4.9 The following contributions have a 33% discount for affordable housing:

- *Open Space, Sport and Recreational Facilities*
- *Community Facilities”*

Affordable Housing Supplementary Planning Document (July 2018) – CD6.3

- 4.26 The Affordable Housing Supplementary Planning Document (“SPD”) was adopted in 2018, it is intended to provide guidance on how the Council will secure affordable housing, with the intention of supporting proposed developments and helping to deliver sustainable communities.
- 4.27 It primarily supports Policies DP31 (Affordable Housing) and DP32 (Rural Exception Sites) within the District Plan. It should also be noted that this SPD was also produced under the 2012 NPPF definition of affordable housing, so its definition (page 8) once more cannot be considered to contain all those who would fall under the updated broader definition from the 2018 NPPF onwards.
- 4.28 As well as defining what it considers to be affordable housing, it also outlines the eligibility criteria for those able to access it, namely, local incomes and local house prices.
- 4.29 At paragraph 2.32 it supports the 75:25 tenure split for social or affordable rent and intermediate homes respectively.
- 4.30 It also sets out the Councils mechanism for reviewing viability assessments, making clear that whilst the expectation is that developments will meet their quota in full, DP31 is not intended to render development unviable and harm the delivery of housing overall.
- 4.31 At paragraph 2.43 the SPD makes clear that affordable housing should be fully integrated *“in clusters of no more than 10 dwellings (unless in high density flatted schemes where clusters of more than 10 units may be allowed) rather than concentrated in one location”*. It expands on this by requiring a ‘tenure blind’ approach to the aesthetics of houses, so that market and affordable homes are indistinguishable.

National Planning Policy Framework (NPPF)

- 4.32 The NPPF was most recently updated in December 2024, with a very minor update following in February 2025, and is a material consideration. It identifies the role of affordable housing in the plan-making and decision-making process.
- 4.33 A draft revised NPPF was published for consultation in December 2025 and whilst it is a material consideration, it carried limited weight due to its draft status. Please refer to Section 2 for further details.

Corporate Documents

4.34 The Council's corporate documents identify the delivery of affordable housing as a high corporate priority of Mid Sussex. These include the following documents and is summarised in turn:

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

Council Corporate Plan and Budget 2026 – 2027 – CD6.9

4.35 The importance of having a safe and secure home, but the challenge of securing this are highlighted in paragraph 5:

“Having a place to call home is the most fundamental driver of well-being and provides the foundation for work, learning and community participation. However, finding a suitable and affordable home to live in is a huge challenge for many people”.

4.36 The Plan refers to the work the Council is doing to try and tackle homelessness and provide high quality local temporary accommodation. This includes continuing to build on the Homelessness Prevention surgeries (paragraph 6) and continuing to purchase properties which can be used as temporary accommodation meaning families don't need to stay in nightly paid accommodation outside of the District (paragraph 7).

4.37 Paragraph 7 goes on to explain that housing families outside the District means that they are away from their support networks and schools and comes at a significant cost. The benefits of being able to house families within the District means:

“people can keep their connections with local schools and communities...as well as providing the best option for vulnerable people and families, this also makes economic sense when we know temporary accommodation is a cause of debilitating financial challenges for other Authorities”.

4.38 In terms of investment in temporary accommodation, paragraph 20 notes that the Council plans to invest £8m in temporary accommodation.

4.39 As set out at paragraph 93, a key priority for the Council's Housing Department is the prevention of homelessness and addressing local housing challenges.

Homelessness Review 2019 – CD6.11

- 4.40 The impacts of homelessness are set out on page 8 as being *“devastating for individuals and families. It can affect both physical and mental health, education and employment opportunities (for both adults and children) and can have long term consequences for those affected. For these reasons reducing homelessness and rough sleeping is a priority for the Council”*.
- 4.41 The Review notes that the number of households in temporary accommodation has significantly increased over the past 5 years and that this has been compounded by factors such as fewer affordable homes becoming available and reduced access to private sector housing for those on low incomes (page 12).
- 4.42 In terms of temporary accommodation, the Review indicates that due to the shortage of temporary accommodation in the District it is not uncommon for households to be placed outside the District, typically in nightly paid privately-owned guest house properties. This type of accommodation is expensive and as it is outside the District may result in households experiencing difficulties accessing employment and social networks. In addition, an increase in the use of privately run nightly paid accommodation increase pressure on the Council’s budget (page 33).
- 4.43 It is explained on page 40 that Mid Sussex has 54.4 social housing dwellings available per 1,000 of its population which is below the county average of 57.9.

Homelessness and Rough Sleeping Strategy 2020 – 2025 – CD6.10

- 4.44 The Foreword by Councillor Andrew MacNaughton (Cabinet Portfolio Holder for Housing and Planning) notes that the strategy has been developed *“against a backdrop of acute housing shortages, particularly affordable housing shortages across the county with affordability ratios a significant issue for Mid Sussex”*. Councillor MacNaughton goes on to highlight *“Mid Sussex District Council has always made the provision of housing a priority as we understand the fundamental role secure housing makes in contributing to lifetime opportunities”*. He also notes *“there is growing evidence that shortages in the supply of affordable housing are putting additional pressure on households to find and sustain suitable affordable homes”*.

- 4.45 Page 6 of the Strategy reports that the supply of housing is unable to meet demand, as approximately 386 social homes become available each year, but there are over 1,424 households on the Housing Register⁶.
- 4.46 Following the Homelessness Review, the Council identified a number of priorities for addressing homelessness within Mid Sussex which include minimising the use of and improving temporary accommodation and enabling access to suitable and affordable accommodation.
- 4.47 In terms of seeking to prevent and relieve homelessness, one of the challenges acknowledged by the Council is that the expectations of accessing social housing are not realistic relative to the actual supply and demand of social housing locally (page 15).
- 4.48 With regards to temporary accommodation, Priority Two of the Strategy notes that being in temporary accommodation *“can be a very stressful and negative experience” and that the Strategy seeks to priorities “the provision of more good quality temporary accommodation within the District and to enable those households to move through temporary accommodation into a settled homes as soon as possible”* (page 23).
- 4.49 The challenges with seeking to minimise the use of and improve temporary accommodation are set out on page 23 and include that fact that the number of temporary accommodation properties in the District is not sufficient to meet the need, and high costs of private rented accommodation and insufficient social housing limits the ability to move households out of temporary accommodation.
- 4.50 Priority Five of the Strategy relates to enabling access to suitable and affordable accommodation, with a key action noted as being that the Housing Enabling Team will aim *“to utilise every opportunity to meet the need for affordable housing through the application of our planning policies as well as working directly with housing associations and other affordable housing providers and maximising affordable housing on MSDC owned sites”*.

Summary and Conclusions

- 4.51 The relevant Development Plan in respect of affordable housing for Mid Sussex currently comprises the Mid Sussex District Plan 2014-2031 (March 2018) and the Haywards Heath Neighbourhood plan (December 2016).

⁶ The number of households on the Housing Register has now increased to 2,613 (31 March 2026) (Source: FOI Appendix JS2)

- 4.52 The evidence set out in this Section clearly highlights that within adopted policy, emerging policy and a wide range of other plans and strategies, providing affordable housing has long been established as, and remains, a key issue which urgently needs to be addressed within Mid Sussex.
- 4.53 The appeal proposals provide an affordable housing contribution which meets requirements of the District Plan, Policy DP31 (30%).
- 4.54 The delivery of up to 24 affordable homes at the appeal site will make a significant contribution towards the annual affordable housing needs of the District, particularly when viewed in the context of past rates of affordable housing delivery which is considered in more detail in Section 6 of my evidence.

Affordable Housing Needs

Section 5

Introduction

- 5.1 This section explores the affordable housing needs identified in the adopted Development Plan and its associated evidence base, as well as more recent assessments of affordable housing need in order to provide a comprehensive understanding of formally identified affordable housing needs across the District.

The Development Plan

- 5.2 The adopted Development Plan does not define a numerical target for the provision of affordable homes. Instead, the adopted District Plan seeks 30% affordable housing provision is made from qualifying developments (Policy DP31).
- 5.3 In the absence of a defined affordable housing target figure in adopted policy, it is important to consider the objectively assessed need for affordable housing within the most recent assessments of local housing need.

Housing Market Assessments

- 5.4 Five Housing Market Assessments (including updates) have been published over the course of the past 11 years, that form part of the evidence base for the adopted and emerging Mid Sussex District Plans. These are summarised in turn below.

Housing and Economic Development Needs Assessment (February 2015) – CD6.13

- 5.5 The Housing and Economic Development Needs Assessment (HEDNA) was prepared independently by Mid Sussex Council and originally published in February 2015 and underpins the District Plan's housing policies. The HEDNA covers the 17-year period between 2014 and 2031.
- 5.6 Section 4 considers the calculation of affordable housing need, drawing upon the Northern West Sussex Housing Market Area - Affordable Housing Needs Model Update (2014) ("2014 AHNM"), which was prepared jointly by Mid Sussex, Horsham and Crawley Councils.
- 5.7 The HEDNA explains that the 2014 AHNM presents four affordable housing need scenarios, considering the differing levels of need arising from households to whom Local

Authorities must give 'reasonable preference' (low estimate), as compared with the wider Housing Register waiting list (high estimate) and use of the CLG Household Projections or the now cancelled SHMA Practice Guidance approach.

- 5.8 Paragraph 4.164 indicates a preference for use of CLG Household Projects which are *"considered to provide a much more realistic estimate as it accounts for changing household circumstances, migratory pressures and dissolution of households"*. The assessments that following in the HEDNA are, therefore, based on just two scenarios: - the low and high estimates of need based on the CLG Household Projections.
- 5.9 The HEDNA goes on to identify a net annual affordable housing need of 116 affordable dwellings per annum based on the low estimate and 223 affordable dwellings per annum based on the high estimate (paragraph 4.165 and table 32).
- 5.10 For the purposes of this Proof of Evidence, I consider that the high estimates/total housing waiting scenario is the most appropriate indication of the true affordable housing needs. It is more representative of the Annex 2 NPPF definition of affordable housing, which includes all those whose needs are not met by the market. Restricting calculations on affordable housing need to only those within reasonable preference groups turns a blind eye to a large number of households who are also in need of affordable housing, excluding many that the NPPF definition of affordable housing is seeking to capture.

Housing and Economic Development Needs Assessment (November 2015) – CD6.14

- 5.11 An updated HEDNA was subsequently published in November 2015 and covers the same period between 2014 and 2031. This update considers further sensitivity analysis and more detailed work on market signals.
- 5.12 Table 17 (page 24) identifies the affordable housing needs based on 'Reasonable Preference' is 127 affordable homes per annum. Table 18 (page 24) identifies an affordable housing need based on the total 'Housing Waiting List' of **230 affordable homes per annum**.
- 5.13 Similarly to the approach taken to the data in the February 2015 HEDNA (paragraph 5.10), the higher estimate of a need for 230 affordable homes per annum is considered to be a more accurate reflection of the actual affordable housing needs.

Housing and Economic Development Needs Assessment Addendum (August 2016) – CD6.15

- 5.14 The HEDNA Addendum was prepared in August 2016 and was produced in order to account for newly released population and household projections. The table associated

with paragraph 1.47 (page 8) notes that this newly released data means the affordable housing need is now 170 affordable homes per annum based on 'Reasonable Preference Groups' and **272 per annum based on total 'Waiting List'**. As explained above, it is the higher estimate that is taken forward.

Strategic Housing Market Assessment (2021) – CD7.6

- 5.15 The SHMA 2021 was prepared by Icení and *"includes an updated assessment of affordable housing need which responds to the widened definition of affordable housing set out in the Framework. This includes households who might be able to rent a home in the private sector without financial support but aspire to own a home and require support to do so"* (paragraph 12.6, page 160).
- 5.16 As a result, the SHMA provides two main outputs on affordable housing, the first being the identified need for social/affordable rented housing and secondly to consider the need for affordable home ownership.
- 5.17 Table 12.1 (pages 160-161) identifies a net affordable need for 470 net homes for affordable rent / social rented units, equivalent to 7,990 net rented affordable homes over the 17-year period between 2021 and 2038.
- 5.18 Table 12.1 (pages 160-161) identifies a net need for 455 affordable homeownership homes per annum across Mid Sussex, equivalent to 7,735 net affordable homeownership homes over the 17-year period.
- 5.19 As such, **the 2021 SHMA identifies a total net need for 925 net affordable dwellings per annum** across Mid Sussex, equivalent to 15,725 affordable dwellings over the 17-year period.

Mid Sussex Strategic Housing Market Assessment Update (2024) – CD7.7

- 5.20 An updated SHMA was prepared in 2024 by Icení. This update reflects the extended Plan period being proposed by the emerging new Local Plan (now up to 2040), accounts for the publication of new data and with regards to the affordable housing analysis considers in particular how housing costs have changed since 2021 focusing on house prices/rents, incomes and supply of housing through relets.
- 5.21 Similarly to the 2021 SHMA, the Update also includes two outputs; need for social/affordable rent housing and need for affordable home ownership.
- 5.22 Table 3.4 identifies a net annual need for **383 affordable rent or social rent homes per annum** over the period 2021 - 2040.

- 5.23 At paragraph 3.9, it is explained that the reduction in the need for affordable/social rent since the 2021 SHMA is attributed in part to: *“the estimate of a high increase in local incomes (although rent levels have also risen).”* Paragraph 3.7 notes the median income of £60,000 for the District is some 42% higher than that reported in the 2021 SHMA.
- 5.24 In terms of affordable home ownership, Table 3.7 identifies a net need for **311 intermediate/low-cost home ownership properties per annum** over the period 2021-2040.
- 5.25 As such, the 2024 SHMA identifies a **total net need for 694 net affordable dwellings per annum** across Mid Sussex, equivalent to 13,186 affordable dwellings over the 19-year period.
- 5.26 As set out in the explanatory text at paragraph 3.15 there is also a reduction in the need for affordable home ownership products compared to the 2021 SHMA figure. The report notes that: *“This also shows a slightly lower need in this update, which is likely to mainly be driven by the finding of a smaller ‘gap’ in incomes required to buy and rent respectively, together with some improvement in the relet supply of intermediate housing based on the latest available data.”*
- 5.27 Although the 2024 SHMA identifies a lower annual affordable housing need figure than that the 2021 SHMA, this is partly due to the longer plan period used in the updated study. By distributing the affordable need over an extended timeframe, the 2024 SHMA generates a lower annualised figure. Consequently, the decrease should be viewed in the context of both the longer assessment period and the incorporation of updated evidence (2021 census), rather than as a directly comparable reduction in underlying need.
- 5.28 Despite the lower annual requirement reported in the 2024 SHMA, the overall level of affordable housing need remains substantial. The 2021 SHMA identified a need for 15,725 affordable homes, compared with 13,186 in the 2024 update. When viewed in the context of the longer assessment period applied in the updated study, the reduction in total need is relatively modest, suggesting that affordable housing need continues to be a significant issue across the area.

Summary and Conclusions

- 5.29 Figure 5.1 below provides a summary of the affordable housing needs identified through the various Needs Assessments published between 2015 and 2024.

Figure 5.1: Summary of Annual Average Housing Needs based on the Council's published Housing Needs Assessments from 2015 – 2024

Report	Monitoring Period	Annual Average Affordable Housing Needs (per annum)
Mid Sussex HEDNA (February 2015)	2014-2031	223 (based on Total Waiting List)
Mid Sussex HEDNA Update (November 2015)	2014-2031	230 (based on Total Waiting List)
Mid Sussex HEDNA Addendum (2016)	2014-2031	272 (based on Total Waiting List)
Mid Sussex SHMA (2021)	2021-2038	925
Mid Sussex SHMA Update (2024)	2021-2040	694

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

- 5.30 The most recent assessment of affordable housing need (SHMA Update 2024) identified a need for 694 affordable homes per annum.
- 5.31 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.
- 5.32 There is a clear and on-going pressing need for more affordable homes in Mid Sussex. The delivery of up to 24 affordable homes proposed on the appeal site would make a meaningful contribution to the meeting the affordable housing needs of Mid Sussex District Council.

Affordable Housing Delivery

Section 6

Introduction

- 6.1 This section of the evidence analyses the delivery of affordable housing in Mid Sussex. It highlights significant shortfalls in meeting identified needs, illustrating a pressing need for a substantial increase in affordable housing provision across the District.

Past Affordable Housing Delivery

- 6.2 Figure 6.1 illustrates the delivery of affordable housing (“AH”) in Mid Sussex since the start of the District Plan period in 2014/15.

Figure 6.1: Gross Additions to Affordable Housing Stock, 2014/15 to 2025/26

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
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 (16 October 2025), *FOI (15 May 2026), **Mid-Sussex Housing Land Supply Monitoring Completions (CD22.26 and CD22.27).

- 6.3 Between 2014/15 and 2025/26, a total of 11,246 dwellings were delivered in Mid Sussex, equivalent to 934 per annum. Of these, 2,883 dwellings were affordable tenures, equivalent to 2,408 affordable dwellings per annum. This equates to 26% gross affordable housing delivery.
- 6.4 However, it is important to note that the gross affordable completions figure does not take into account any losses from the affordable housing stock through demolitions nor through Right to Buy (“RtB”) sales from existing Registered Provider (“RP”) affordable housing stock.
- 6.5 At a national level over two million households have exercised their Right to Buy since it was introduced in 1980. In her Written Ministerial Statement of 30 July 2024, the then incoming Deputy Prime Minister observed that Right to Buy sales have not been matched by the rate of replacements, making it harder for Councils to accommodate households in need:
- “Over the last five years, there has been an average of 9,000 Council Right to Buy sales annually, but only 5,000 replacements each year. Right to Buy provides an important route for Council tenants to be able to buy their own home. But the discounts have escalated in recent years and Councils have been unable to replace the homes they need to move families out of temporary accommodation.”*
- 6.6 Figure 6.2 below calculates the affordable housing delivery per annum since the start of the District Plan period in 2014/15, net of Right to Buy sales.

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Figure 6.2: 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	40%
2025/26	889**	373*	Unknown	373	42%
Totals	11,246	2,883	28	2,855	25%
Avg. Pa.	937	240	3	238	

Source: MHCLG, FOI (16 October 2025), *FOI (15 May 2026), **Mid-Sussex Housing Land Supply Monitoring Completions (CD22.26 and CD22.27)

6.7 Figure 6.2 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, equivalent to 25% of the total average number of net housing completions (please note 2025/26 is gross as RtB data not available at the time of writing).

6.8 For the purposes of subsequent analysis, the net of Right to Buy figures have been applied.

Affordable Housing Delivery Compared to Affordable Housing Needs

6.9 The previous section of this Proof did refer to the two 2015 HEDNAs, primarily because the methodology adopted in these assessments is the same as in the 2016 HEDNA Addendum and is not repeated in that report. Therefore, it was useful to set out the approach taken in the 2016 HEDNA Addendum by referring to the earlier assessments. Given all three reports were referred to in the Local Plan, only the more recent of the

three, the 2016 HEDNA is used in the following comparison, as it represents the most recent position underpinning the Local Plan.

2016 HEDNA Addendum – CD6.15

- 6.10 Figure 6.3 illustrates the net of Right to Buy affordable housing delivery compared to the housing need as set out in the 2016 HEDNA Addendum for the period between 2014/15 to 2025/26.

Figure 6.3: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2016 HEDNA Addendum, 2014/15 to 2025/26

Monitoring Year	Additions to AH Stock (Net of RtB)	2016 HEDNA Addendum AH Needs (Net)	Annual Shortfall/ Surplus	Cumulative Shortfall	Additions as a %age of Needs
2014/15	218	272	-54	-54	80%
2015/16	106	272	-166	-220	39%
2016/17	172	272	-100	-320	63%
2017/18	96	272	-176	-496	35%
2018/19	98	272	-174	-670	36%
2019/20	211	272	-61	-731	78%
2020/21	244	272	-28	-759	90%
2021/22	347	272	75	-684	128%
2022/23	367	272	95	-589	135%
2023/24	300	272	28	-561	110%
2024/25	323	272	51	-510	119%
2025/26	373*	272	101	-409	137%
Total	2,855	3,264	-409		87%
Avg. Pa	238	272	-34		

Source: FOI Data (14 October 2025), Mid-Sussex Housing Land Supply Monitoring Completions (CD22.26 and CD22.27) and 2016 HEDNA Addendum *2025/26 is a gross figure as RtB data not available at the time of writing

- 6.9 Since the start of the 2016 HEDNA Addendum period in 2014/15, affordable housing completions (net of Right to Buy) have averaged 238 net affordable dwellings per annum, against a need of 272 net affordable dwellings per annum. This has resulted

in a cumulative shortfall of -409 affordable homes or -34 affordable dwellings per annum.

2021 SHMA – CD7.6

- 6.10 The 2021 SHMA and subsequent 2024 SHMA Update forms part of the evidence base for the emerging District Plan. However, as the Plan is currently undergoing independent examination, these assessments are yet to have been rigorously tested.
- 6.11 Figure 6.4 below illustrates net of Right to Buy affordable housing delivery compared to the updated need of 925 net affordable dwellings per annum as identified in the 2021 SHMA, between 2021/22 and 2025/26.

Figure 6.4: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2021 SHMA, 2014/15 to 2025/26*

Monitoring Period	Additions to AH Stock (Net of RtB)	2021 SHMA AH Needs (Net)	Annual Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2021/22	347	925	-578	-578	38%
2022/23	367	925	-558	-1,136	40%
2023/24	300	925	-625	-1,761	32%
2024/25	323	925	-602	-2,363	35%
2025/26	373*	925	-552	-2,915	40%
Total	1,710	4,625	-2,915		37%
Avg. Pa.	342	925	-583		

Source: FOI Data (14 October 2025), Mid-Sussex Housing Land Supply Monitoring Completions, 2021 SHMA and

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

- 6.12 Figure 6.4 illustrates that over the first five years of the 2021 SHMA period, where the affordable housing requirement is 925 affordable homes per annum, there has been a total of 342 additions per annum to affordable housing stock net of Right to But losses, resulting in a total cumulative shortfall of -2,915 net affordable homes over the period. This equates to an annual average shortfall of -583 affordable homes.

Mid Sussex Strategic Housing Market Assessment Update (2024) – CD7.7

- 6.13 Figure 6.5 illustrates net of Right to Buy* affordable housing delivery between 2021/22 and 2025/26 compared to the identified affordable housing need of 694 net affordable dwellings per annum, as set out in the 2024 SHMA Update.

Figure 6.5: Net of Right to Buy Additions to Affordable Housing Stock vs Needs Identified in the 2024 SHMA Update, 2014/15 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	694	-347	-347	50%
2022/23	367	694	-327	-674	53%
2023/24	300	694	-394	-1,068	43%
2024/25	323	694	-371	-1,439	47%
2025/26	373*	694	-321	-1,760	54%
Total	1,710	3,470	-1,760		49%
1aAvg. Pa.	342	694	-352		

Source: FOI Response (14 October 2025), Mid-Sussex Housing Land Supply Monitoring Completions and 2024 SHMA Update and *2025/26 is gross as RtB data not available at the time of writing

- 6.14 Over the first five years of the 2024 SHMA Update period affordable housing completions (net of Right to Buy* - see above) have averaged just 342 net affordable dwellings per annum, against a need of 694 net affordable dwellings. A shortfall of -1,760 dwellings has arisen over the five-year period, equivalent to an average annual shortfall of -352 affordable dwellings.

Affordable Housing Delivery in Haywards Heath

- 6.15 Figure 6.6 illustrates the delivery of affordable housing in Haywards Heath Parish since the start of the District Plan period in 2014/15.

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Figure 6.6: Gross Additions to Affordable Housing Stock in Haywards Heath Parish, 2014/15 to 2025/26

Monitoring Year	Total Housing Completions (Net)	Additions to AH stock (Gross)	Gross affordable additions as a %age of total completions
2014/15	173	17	10%
2015/16	259	29	11%
2016/17	213	30	14%
2017/18	281	4	1%
2018/19	217	11	5%
2019/20	361	71	20%
2020/21	185	10	5%
2021/22	289	20	7%
2022/23	145	44	30%
2023/24	329	11	3%
2024/25	24	4	17%
2025/26	15	0	0%
Totals	2,491	251	10%
Avg. Pa.	208	21	

Source: FOI Response (15 May 2026) and Mid-Sussex Housing Land Supply Monitoring Completions.

6.16 Over the 12-year period between 2014/15 and 2025/26 there have been a total of 2,491 net overall housing completions and 251 affordable housing completions in Haywards Heath Parish. Losses to existing stock through the Right to Buy are not recorded on a parish basis. The figure given above is therefore a gross figure.

6.17 Affordable housing delivery in Haywards Heath Parish should be viewed in context of the fact that as of 14 May 2026⁷ there were 672 households on the Councils Housing Register specifying Haywards Heath Parish as their preferred choice of location and in the period 2025/26 no new affordable homes were provided and only four delivered in the previous year.

Summary and Conclusions

6.11 The above evidence demonstrates that across Mid Sussex District, the delivery of affordable housing has fallen persistently short of meeting identified needs. A summary of the shortfalls is set out in Figure 6.7 overleaf.

⁷ FOI (Appendix JS2) provided latest figures set at 14/05/26

Figure 6.7: Summary of Annual Average Affordable Housing Completions (Net of Right to Buy) Vs Annual Average Affordable Housing Needs Report*

	Monitoring Period	Annual Averages AH Completions (Net of RtB*)	Annual Average Affordable Housing Needs	Annual Average Shortfall	Cumulative Shortfall	Additions as a %age of Needs
2016 HEDNA Addendum	2014-2031	238	272	-34	-409	87%
2021 SHMA	2021-2038	342	925	-583	-2,915	37%
2024 SHMA Update	2021-2040	342	694	-352	-1,760	49%

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

- 6.12 In the 12-year period since the start of the District Plan in 2014/15, net of Right to Buy affordable housing delivery represented just 25% of overall housing delivery, equating to just 238 affordable dwellings per annum.
- 6.13 Against the needs identified in the 2016 HEDNA Addendum of 272 dwellings per annum, a total shortfall of -409 (-34 per annum) dwellings have accrued in the 12 monitoring years over the 2016 HEDNA Addendum period.
- 6.14 Against the higher need figure identified in the 2021 SHMA of 925 per annum, a cumulative shortfall of -2,915 affordable dwellings (-352 per annum) have occurred in the five monitoring years since 2021/22.
- 6.15 The 2024 SHMA Update was published later as an update to the 2021 SHMA which identified a lower affordable need of 694 dwellings per annum (including social/affordable rent and affordable home ownership). In the first five years of the 2024 SHMA Update, there has already been an accumulated shortfall of -1,760 affordable dwellings (-352 per annum) since 2021/22.
- 6.16 It is clear that a 'step change' in affordable housing delivery is needed now in Mid Sussex District to address these shortfalls and ensure that the future authority-wide needs for affordable housing can be met.
- 6.17 In light of the identified level of need there can be no doubt that the delivery of up to 24 affordable dwellings on the proposed site will make an important contribution to the affordable housing needs of Mid Sussex District.

Affordability Indicators

Section 7

Introduction

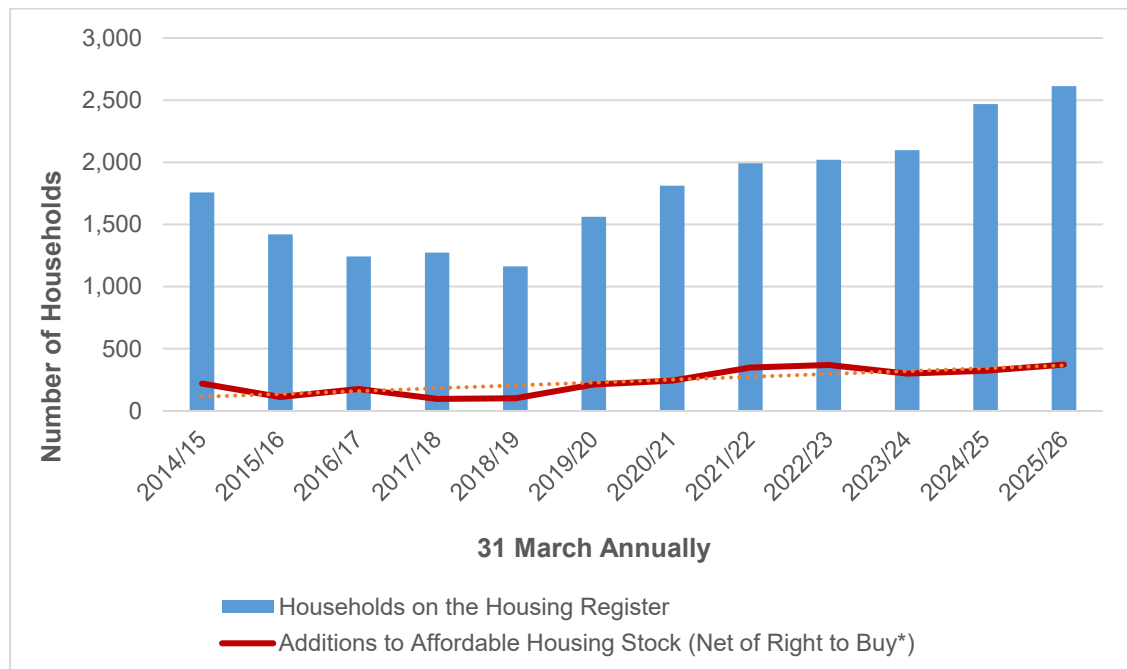
- 7.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability. I acknowledge that this is in the context of plan making.

Housing Register

- 7.2 The Council's Freedom of Information 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**).
- 7.3 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.
- 7.4 Figure 7.1 provides a comparative analysis of the number of households on the Housing Register on 31 March each year and affordable housing delivery (net of Right to Buy, except for 2025/26 which is a gross figure) in the corresponding monitoring year ending on 31 March across Mid Sussex since the start of the District Plan period in 2014/15.

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Figure 7.1: Number of Households on the Housing Register Compared with Additions to Affordable Housing Stock (Net of Right to Buy*), 2014/15 to 2025/26



Source: MHCLG Open Data and FOI Response (15 May 2026), *2025/26 is gross as RtB data not available at the time of writing.

7.5 As Figure 7.1 clearly illustrates, affordable housing delivery has failed to keep pace with identified need on the housing register by a considerable margin for every single year in Mid Sussex since 2014/15.

7.6 Footnote 4 of MHCLG⁸ Live Table 600 highlights that:

“The introduction of choice-based approaches in 2003, where applicants have more choice about where they live, contributed to a rise in the number of households on housing registers. The Localism Act 2011 then contributed to a decrease in the number of households housing registers, as it allowed local authorities to set their own qualification criteria.”

7.7 Evidently the result of the Localism Act is that many Local Authorities, including Mid Sussex, have been able to exclude applicants already on Housing Register waiting lists who no longer meet the new narrower criteria but who are still in need of affordable housing.

⁸ Ministry of Housing, Communities and Local Government

- 7.8 Following the changes brought about by the Localism Act, Mid Sussex published a revised Housing Allocations Scheme which received further revisions in **May 2014, August 2019 and June 2025**.
- 7.9 Despite this it is important to reiterate that the number of households on the Housing Register has actually increased by 24% in the past 12-months, indicating a worsening of affordability across Mid Sussex.
- 7.10 Whilst restricting the entry of applicants on to the Housing Register may temporarily reduce the number of households on the waiting list, this does not reduce the level of need, it merely displaces it.
- 7.11 In the appeal at Oxford Brookes University Campus at Wheatley, (**CD12.4, p74, [13.101]**) Inspector DM Young asserted at paragraph 13.101 of their report that in the context of a lengthy housing register of 2,421 households:
- “It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses”* (my emphasis).
- 7.12 The Inspector went on to state at paragraph 13.102 that:
- “Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list”* before concluding that *“Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight”*.
- 7.13 In undertaking the planning balance, the Inspector stated at paragraph 13.111 of their report that:
- “The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as “acute” by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight”*.
- 7.14 In determining the appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery. In my opinion the numbers on LPA’s housing register remains high.

- 7.15 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF – Annex 2 definitions i.e. social rented, other affordable housing for rent, discounted market sales housing and other affordable routes to home ownership including shared, relevant equity loans, other low-cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.
- 7.16 In short, there remains a group of households who fall within the gap of not being eligible to enter the housing register, but who also cannot afford a market property and as such need affordable housing. It is those in this widening affordability gap who, I suggest, the Government intends to assist by increasing the range of affordable housing types in the NPPF.
- 7.17 As such, the number of households on the Housing Register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents.

Waiting Times for Housing

- 7.18 The Council's Freedom of Information response (**Appendix JS1 and JS2**) shows that successful applicants for affordable housing face lengthy and increasing waits for an affordable home in Mid Sussex District.
- 7.19 Figure 7.2 illustrates 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.

Figure 7.2: Housing Register Average Waiting Times, 31 March 2025 and 31 March 2026

Size of Affordable Property	Average Waiting Time to be Housed (31 March 2025)	Average Waiting Time to be Housed (31 March 2026)
1-bedroom home	383 days	422 days
2-bedroom home	333 days	319 days
3-bedroom home	694 days	491 days
4+ bedroom home	766 days	1,191 days

Source: FOI response (14 October 2025) and FOI response (15 May 2026)

- 7.20 Notably, the average waiting times for an affordable 1-bedroom home increased by 39 days (just over a month) from 383 days on 31 March 2025 to 422 days on 31 March 2026. Applicants requiring a 1-bedroom affordable home are, therefore, now waiting well in excess of a year before being housed.
- 7.21 Furthermore, the position is particularly stark in respect of large family homes. The average waiting times have more than doubled (+55.5%) for an affordable 4+bedroom home from 766 days on 31 March 2025 to now 1,191 days on 31 March 2026. This represents an increase in 425 days (more than a year). Put another way, households requiring a 4+bedroom affordable home are now waiting on average three years to secure an affordable home.
- 7.22 Whilst there has been a decrease in the waiting times for 2 and 3 bedroom affordable properties, these are still close to an 11- or 16-month wait, which is not insignificant.
- 7.23 It is crucial to note that these figures represent averages, implying that some households may have been waiting even longer than the indicated times. Additionally, these statistics only capture the waiting times for successful applicants, typically those in the highest priority need. Households with less urgent needs can anticipate significantly lengthier waiting periods.

Housing Register Bids and Lettings

- 7.24 The Council's FOI response (**Appendix JS2**) confirms that as of 14 May 2026⁹, 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 FOI response also indicates that in 2024/25 only 62 affordable properties were advertised in the Haywards Heath Civil Parish; which is significantly below the number of households on the Council's Housing Register who identified Haywards Heath as their preferred location.

Temporary Accommodation

- 7.25 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. The 14 households housed outside of Mid Sussex District means that not only does this mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their

⁹ FOI notes the latest figure as of 14 May 2026

needs, but they may also be located away from their support network, at significant cost to local taxpayers¹⁰.

- 7.26 MHCLG data indicates that Mid Sussex spent £2,510,000 on temporary accommodation between 1 April 2024 and 31 March 2025.
- 7.27 Paragraph 58 of the Mid Sussex Corporate Plan and Budget 2026 - 2027 identifies a significant proportion of its finances spent on temporary accommodation stating: *“The current Programme represents a significant investment of £27.1m. In line with the priority of ongoing financial robustness, it is considered appropriate that opportunities for investment in temporary accommodation (TA) should be taken where possible. As agreed at Q3 2024/25, the Council has already set aside match funding for tranche 3 of the LAHF, and the grant available against this will add a further £800k to the current TA programme.”*
- 7.28 The *“Bleak Houses: Tackling the Crisis of Family Homelessness in England”* report published in August 2019 by the Children’s Commissioner found that temporary accommodation presents serious risks to children’s health, wellbeing, and safety, particularly families in B&Bs where they are often forced to share facilities with adults engaged in crime, anti-social behaviour, or those with substance abuse issues.
- 7.29 Other effects include lack of space to play (particularly in cramped B&Bs where one family shares a room) and a lack of security and stability. The report found (page 12) that denying children their right to adequate housing has a *“significant impact on many aspects of their lives”*.

Homelessness

- 7.30 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 duty¹¹, and a further 324 households in need of relief duty¹² from the Council.
- 7.31 Page 34 of the Mid Sussex Corporate Plan and Budget 2026 - 2027 discusses the Council’s perceived key successes delivered in 2025/26, one of which acknowledging that: *“Housing in Mid Sussex is shaped by significant external pressures and evolving*

¹⁰ **Appendix JS4 a and Appendix JS5** considers the cost of temporary accommodation in detail at paragraphs 3.41 to 3.61 of this evidence.

¹¹ 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 homeless. The prevention duty applies when a Local Authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.

¹² 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.

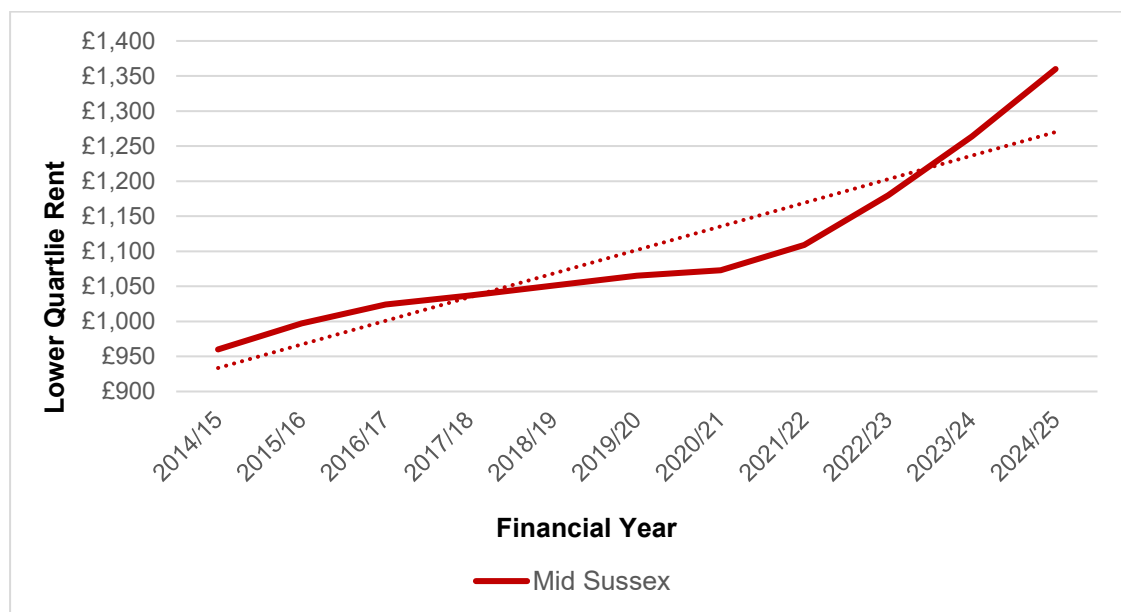
statutory responsibilities. Demand for services continues to rise due to a combination of legislative change, increased cost-of-living pressures, a shrinking affordable private rented sector, and a flow of new households arising from family breakdown. Locally, the main triggers for homelessness approaches remain the end of private tenancies and domestic abuse, while longer stays in temporary accommodation reflect the growing complexity of local housing need.” (My emphasis).

- 7.32 The Private Rented Sector (“PRS”) is not a suitable substitute for affordable housing and does not have an equivalent role in meeting the housing needs of low-income families. It is highly pertinent that in the NPPF, PRS housing is not included within the Annex 2 definition of affordable housing.

Private Rental Market

- 7.33 Office for National Statistics (“ONS”) data (first produced in 2014/15) 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.

Figure 7.3: Average (Mean) Private Sector Rents, 2014/15 to 2024/25



Source: VOA and ONS.

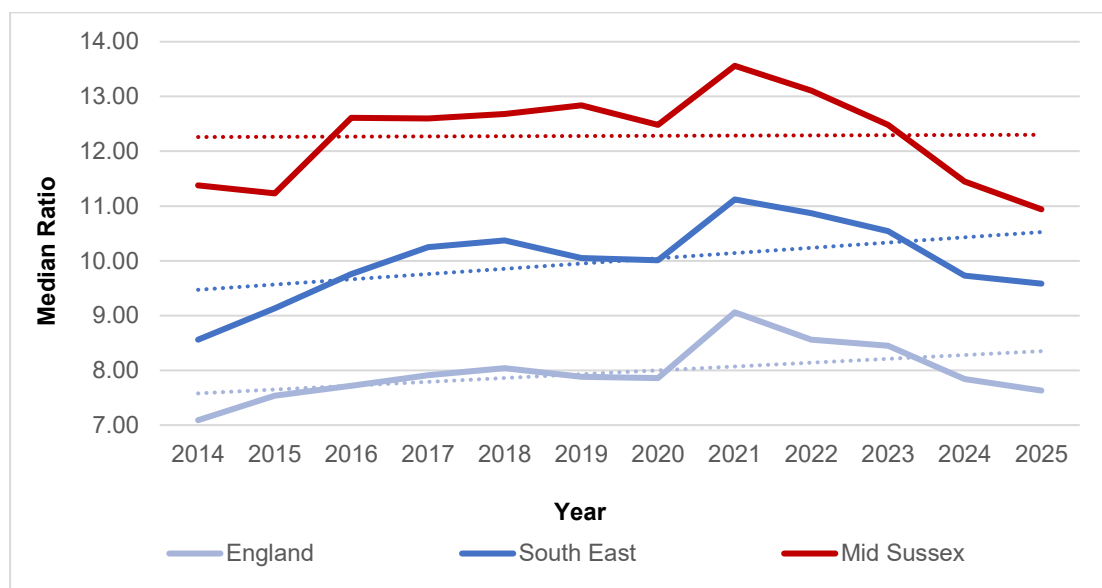
- 7.34 It should also be noted that since the start of the 2024 SHMA Update period in 2021/22, average rents in Mid Sussex have increased by 23%.

- 7.35 It is important to note that ONS rental data is calculated using all transaction data, i.e., existing lets as well as new lets over the period. The data is therefore not necessarily representative of the cost of renting for new tenants in Mid Sussex.

Median House Prices

- 7.36 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%).

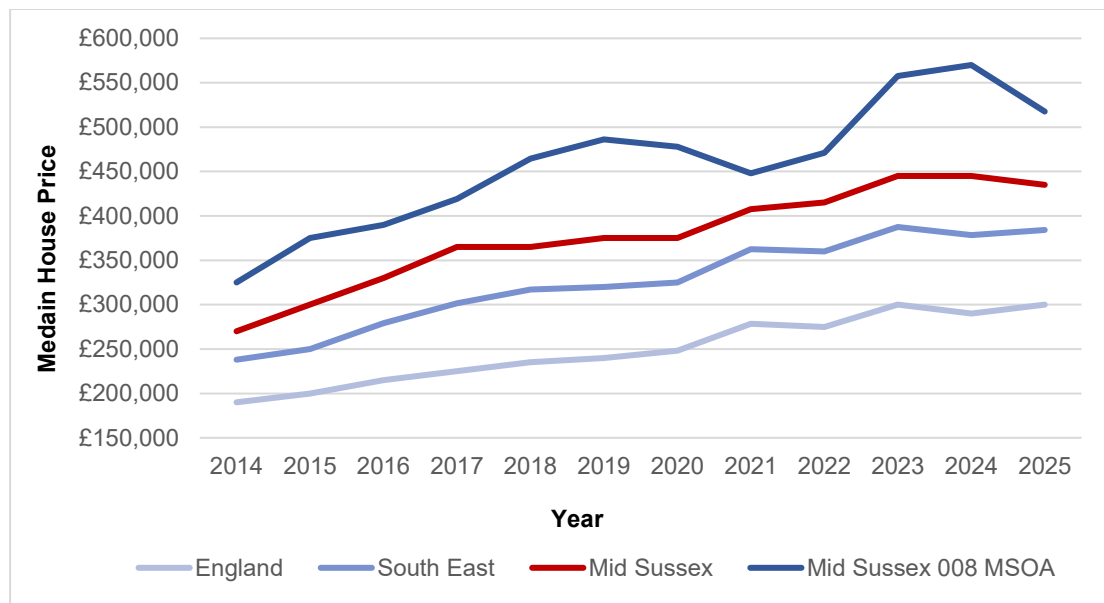
Figure 7.4: Median Workplace-Based Affordability Ratio comparison, 2014 to 2025



Source: ONS.

- 7.37 It is also worth noting that a figure of 8 times average incomes was described as a problem by the former Prime Minister in the foreword to the White Paper entitled 'Fixing our broken housing market' (CD22.5). Here, the affordability ratio is some 37% higher than that.
- 7.38 Figure 7.5 compares the median house sale prices in Mid Sussex 008 MSOA with England, the South East and Mid Sussex. It demonstrates that they have increased dramatically between the start of the District Plan period in 2014 and 2025.

Figure 7.5: Median House Price Comparison, 2014 to 2025



Source: ONS.

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

7.40 It should also be noted that 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 are significantly higher than the comparison areas, but they are also rising at a faster rate.

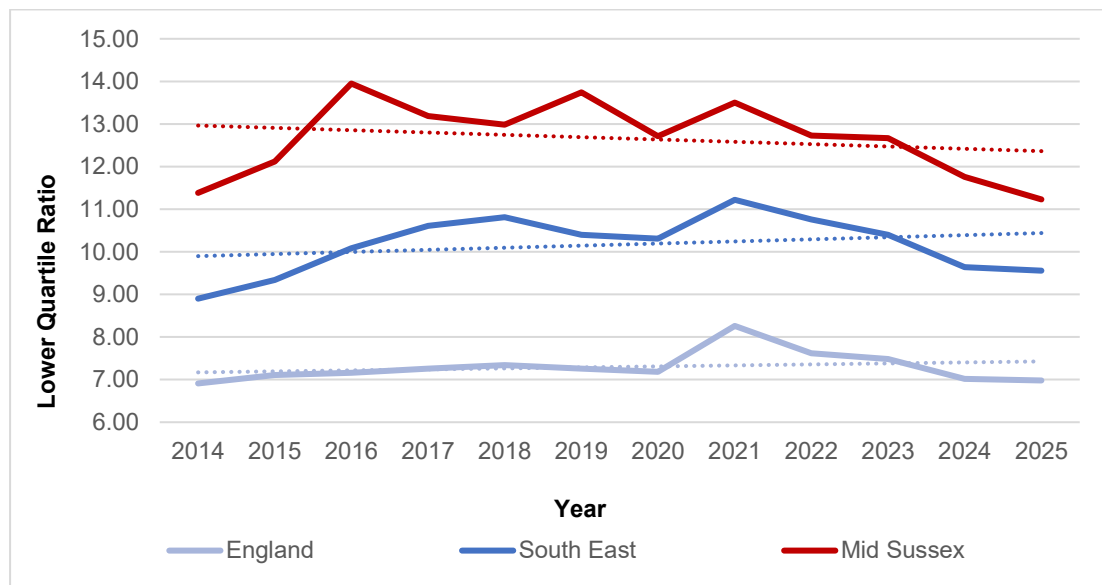
Lower Quartile House Prices

7.41 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**.

7.42 This means that those on lower quartile incomes in Mid Sussex, seeking to purchase a median priced property, now need to find more than 11 times their annual income to do so.

- 7.43 Once again, it remains the case that 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 follows that housing in this area is significantly unaffordable for a significant part of the local population.

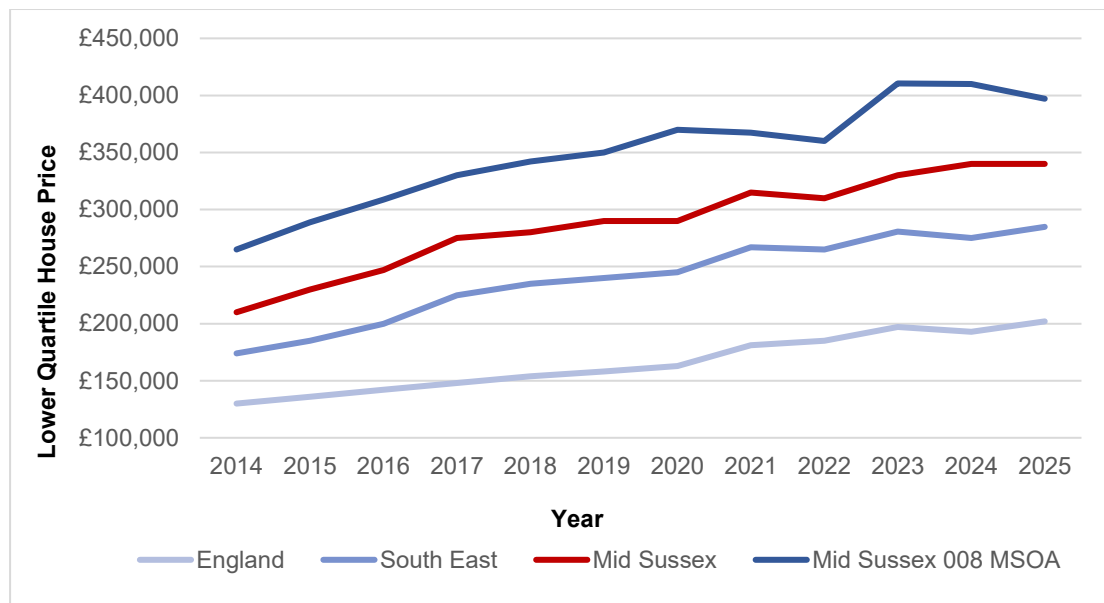
Figure 7.6: Lower Quartile Workplace-Based Affordability Ratio comparison, 2014 to 2025



Source: ONS.

- 7.44 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.
- 7.45 Figure 7.7 below compares the lower quartile house sale prices in the Mid Sussex 008 MSOA with England, South East and the Mid Sussex. Once again, it demonstrates that they have increased dramatically between the start of the District Plan period in 2014 and 2025.

Figure 7.7: Lower Quartile House Price Comparison, 2014 to 2025



Source: ONS.

- 7.46 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 England 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.
- 7.47 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%.
- 7.48 The importance of providing affordable tenures in high value areas for housing was recognised by the Planning Inspector presiding over an appeal at Land at Filands Road/Jenner Lane, Malmesbury, Wiltshire (CD12.7, p.17, [78-79]) in January 2022. In considering the provision of affordable housing at the site and the weight to be attached to this provision the Inspector set out the following at paragraphs 78 and 79 of the decision:

“78. The proposed affordable housing would not be as cheap, either to rent or buy, as housing in some other parts of Wiltshire, because Malmesbury is a relatively high value area for housing. However, the housing would meet all policy requirements in terms of amount, mix, and type of provision. Both Appeals A and

*C would offer affordable housing products as defined by national and local planning policy. I do not diminish the weight to be provided to this provision because such housing might be even cheaper in a theoretical location elsewhere. **In fact, that Malmesbury is a relatively high value area for housing adds more weight to the need for affordable housing products.***

*79. Evidence has been provided that there is more affordable housing either already provided or committed for Malmesbury than the identified need. However, that need is as identified in a Development Plan that is out-of-date in relation to housing, and there is an overall identified shortfall in Wiltshire as a whole. I therefore place **substantial positive weight** on the proposed provision of affordable housing in Appeals A and C. The slightly reduced provision in Appeal C, after taking account of the nursery land, is of no material difference in this regard” (my emphasis).*

Summary and Conclusions

- 7.49 As demonstrated through the analysis in this section, affordability across Mid Sussex has been, and continues to be, in crisis.
- 7.50 House prices and rent levels in both the median and lower quartile segments of the market are unaffordable whilst at the same time the stock of affordable homes is failing to keep pace with the level of demand. This only serves to push buying or renting in Mid Sussex, out of the reach of more and more people.
- 7.51 Analysis of market signals is critical in understanding the affordability of housing. It is my opinion that there is an acute housing crisis in Mid Sussex, with a lower quartile house price to average income ratio of 11.23.
- 7.52 Market signals indicate a worsening trend in affordability in Mid Sussex and within Mid Sussex 008 MSOA. By any measure of affordability, this is an Authority in the midst of an affordable housing crisis, and one through which urgent action must be taken to deliver more affordable homes.

Future Supply of Affordable Housing

Section 8

Introduction

- 8.1 This section of the evidence considers the future supply of affordable housing across Mid Sussex in comparison with identified needs.

Addressing the Shortfall in Affordable Housing Delivery

- 8.2 The 2024 SHMA Update identifies an objectively assessed need for a minimum of 694 net affordable homes per annum between 2021 and 2040. Over the 19-year period this equates to a total need for 13,186 net affordable homes.
- 8.3 In the first five years of the 2024 SHMA Update period, the Council have overseen the delivery of 1,710 affordable homes (net of Right to Buy¹³) against a need of 3,470 net new affordable homes, which has resulted in a shortfall of -1,760 affordable homes.
- 8.4 I consider that any shortfall in delivery should be dealt with within the next five years. This is also an approach set out within the PPG¹⁴ and endorsed at appeal.
- 8.5 The critical importance of understanding the ability of the Council to meet future need was considered in a recent appeal at Sondes Place Farm, Dorking where I provided affordable housing evidence.
- 8.6 The Inspector accepted the findings of the ‘future supply of affordable housing’ evidence and endorsed the use of the Sedgefield approach to clear a previous backlog of affordable housing delivery (**CD12.1, p.16 [85-86]**):

“Compared to the Core Strategy Policy CS4 target a shortfall of 234 affordable homes has arisen across the current development plan period. The most recent evidence of need points to an increased need for affordable homes (143 dpa). However, in the last three years alone, there has been a shortfall of 396 affordable homes due to the delivery of only 33 dpa in those years.

To clear the backlog 222 affordable homes would need to be delivered each year for the next five years. The number of affordable homes coming forward looks to

¹³ 2025/26 completions are gross as RtB data not available at the time of writing

¹⁴ Paragraph: 022 Reference ID: 68-031-20190722

be substantially below that level of delivery. This will mean the existing shortfall will only become worse.” (my emphasis).

- 8.7 The Inspector went on to outline the consequences of not providing sufficient affordable housing (paragraph 88):

“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. In Mole Valley the number of people on the housing register has risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent.”

- 8.8 It is therefore imperative that the -205 dwelling affordable housing shortfall accumulated since 2021/22 is addressed as soon as possible and in any event within the next five years.
- 8.9 When the shortfall is factored into the identified need of 694 affordable homes per annum for the period 2026 and 2031, the number of affordable homes the Council will need to complete increases to 1,046 net affordable homes per annum over the period.
- 8.10 This would ensure that for the remainder of the 2024 SHMA Update period up to 2040 the annual affordable housing need reduces to 694 per annum to deal solely with newly arising needs. This is illustrated in Figures 8.1 and 8.2.

Continued Overleaf

Figure 8.1: Annual Affordable Housing Need incorporating Backlog Needs since the 2021 base date of the 2024 SHMA Update

A	Affordable housing need per annum for the period 2021 to 2040 identified in the 2024 SHMA Update	694
B	Net Affordable housing need for the period 2021/22 to 2025/26 (A x 5)	3,470
C	Net of Right to Buy* sales Affordable housing completions for the period 2021/22 to 2025/26	1,710
D	Shortfall/backlog of affordable housing need for the period 2021/22 to 2025/26 (B – C)	1,760
E	Backlog affordable housing need per annum required over the period 2026 to 2031 (D/5)	352
F	Full affordable housing need per annum for the period 2026 to 2031 (A + E)	1,046
G	Full affordable housing need for the period 2026 to 2031 (F x 5)	5,230

Please note that figures account for rounding and *completions for 2024/25 are gross as RtB data for 2024/25 not yet available

- 8.11 Further indication of the severity of the situation can be seen in Figure 8.2 below which illustrates that the Council would need to deliver 1,046 net affordable homes over the next five years to address backlog needs in line with the Sedgefield approach (which seeks to address accumulated needs within 5 years along with ongoing need).

Figure 8.2: Annual Affordable Housing Need 2026 to 2031 incorporating Backlog Needs Accrued in 2021/22 to 2025/26 when applying the Sedgefield Approach

Monitoring Period	2024 SHMA Update Net Affordable Housing Need per annum	Net Affordable Housing Need per annum When Addressing Backlog Within Next Five Years
2024/25	694	1,046
2025/26	694	1,046
2026/27	694	1,046
2027/28	694	1,046
2028/29	694	1,046
Total	3,470	5,230

- 8.12 It is clear that the backlog of affordable housing needs within Mid Sussex will continue to grow unless the Council takes urgent and drastic action to address needs and deliver more affordable homes.

The Future Supply of Affordable Housing

- 8.13 As agreed in the 5YHLS SoCG (**CD8.3**) the Council's maximum deliverable supply over the next five years (i.e. from 1 April 2026) is 5,293 dwellings. This is based on the Category C, E and F sites of Appendix 3 of the Mid Sussex MS-TP4: Housing Post Hearings Update (May 2026) (**CD7.3**).
- 8.14 However, Local Plan Policy DP31: Affordable Housing only requires the provision of affordable housing on sites proposing 11 dwellings or more, or on sites within the High Weal Area of Outstanding Natural Beauty (AONB) proposing six to 10 dwellings. Appendix 3 of the Mid Sussex MS-TP4: Housing Post Hearings Update (May 2026) (**CD7.3**) notes that over the next five years it is anticipated that 169 dwellings of those included in the Council's five year deliverable supply will be on small sites of less than five dwellings. As these will not be subject to any requirement to provide affordable housing these sites have been discounted from the following future supply calculations. This gives a revised deliverable supply for the purposes of the affordable housing future supply calculations of 5,124 dwellings over the next five years.
- 8.15 It is worth highlighting that this is likely to be an over-estimation, as there could be a proportion of sites delivering six to 10 dwellings which aren't located in the AONB and, therefore, are not required to provide an element of affordable housing.
- 8.16 If we were to generously to assume that all 5,124 dwellings included in the 5YHLS will come forward on sites eligible for affordable housing; and that all of these sites would provide policy compliant levels of affordable housing (i.e. 30%) as a proportion of overall housing completions, this is likely to deliver only 1,537 affordable dwellings over the period, equating to just 307 new affordable dwellings per annum (please figures have been rounded).
- 8.17 This figure falls substantially short of the minimum 1,046 per annum figure required when back log needs are addressed in the first five years in line with the Sedgefield approach and significantly short of the minimum 694 net affordable housing needs per annum identified in the 2024 SHMA Update.
- 8.18 More realistically, if one were to assume that the past gross affordable housing provision of 25% is to be continued over the next five years, this is likely to deliver only 1,281 affordable dwellings over the period, equating to just 256 new affordable dwellings per annum (please note figures have been rounded). Again, this is below the per annum affordable housing need plus backlog (1,046 affordable dwellings) and

the 2024 SHMA Update minimum per annum affordable housing need (694 affordable dwellings).

- 8.19 Figure 8.3 calculates the potential shortfall over the next five years, assuming 1,281 affordable dwellings or 256 per annum will be delivered in the five year period, which importantly does not include addressing the existing shortfall of -1,760 affordable dwellings.

Figure 8.3: Projected Affordable Housing Completions Compared with 2024 SHMA Update Identified Minimum Need 2026/27 – 2030/31

Monitoring Period	Gross Projected (Applicant's Position)	2024 SHMA Update Minimum Net AH Need per Annum	Shortfall	Cumulative Shortfall
2026/27	256	694	-438	-438
2027/28	256	694	-438	-876
2028/29	256	694	-438	-1,314
2029/30	256	694	-438	-1,752
2030/31	256	694	-438	-2,190
Total	1,280	3,470	-2,190	
Avg. Pa	256	694	-483	

Please note might not match figures in paragraph 8.19 due to rounding

- 8.20 The above table shows that future affordable housing needs will also not be met over the next five years. Therefore, the existing shortfall of -1,710 affordable dwellings will increase by another -2,190 affordable dwellings by the end of the 2030/31 monitoring period (i.e. Sedgefield approach).
- 8.21 Putting this into context of the already accumulated shortfalls, Figure 8.4 shows the combined shortfall of affordable housing delivery at the end of the 2030/31 monitoring year of both the existing backlog (-1,760 affordable dwellings) and projected shortfall over the next five years (-2,190 affordable dwellings). As can be seen, the shortfall grows to -3,950 affordable homes by 2030/31.

Figure 8.4: Projected Affordable Housing Completions Compared with 2024 SHMA Update Identified Need

Monitoring Period	Actual Net	Gross Projected (Applicant's Position)	2024 SHMA Update Net AH Need per Annum	Shortfall	Cumulative Shortfall
2021/22	347		694	-347	-347
2022/23	367		694	-327	-674
2023/24	300		694	-394	-1,068
2024/25	323		694	-371	-1,439
2025/26	373*		694	-321	-1,760
2026/27		256	694	-438	-2,198
2027/28		256	694	-438	-2,636
2028/29		256	694	-438	-3,074
2029/30		256	694	-438	-3,512
2030/31		256	694	-438	-3,950
Total	2,990		6,940	-3,950	
Avg. Pa	299		694	-395	

*Please note might not match figures in paragraph 8.19 due to rounding; *2025/26 completions are gross as RtB data not available at the time of writing*

- 8.22 When factoring in the existing backlog in affordable housing delivery and projecting forward the affordable housing delivery over the next five years, this results in a shortfall of -3,950 affordable dwellings at the end of 2030/31 (since 2021/22), which will have equated to an average annual shortfall of -395 affordable homes per annum.
- 8.23 Consequently, I have no confidence that the Council can see a sufficient step change in the delivery of affordable housing to meet annual needs. This makes it even more important that suitable sites, such as the appeal site, are granted planning permission now in order to boost the supply of affordable housing.

Summary and Conclusions

- 8.24 It is imperative that the -1,760 dwelling affordable housing shortfall accumulated since 2021/22 is addressed as soon as possible and in any event within the next five years.

- 8.25 When the shortfall is factored into the minimum identified need of 694 affordable homes per annum for the period 2026 and 2031, the number of affordable homes the Council will need to complete increases to 1,046 net affordable homes per annum over the period.
- 8.26 The above evidence demonstrates that Council is unlikely to be able to meet its affordable housing needs over the next five years. Generously assuming all sites in the 5YHLS (excluding sites under 5 dwellings) would provide policy compliant levels of affordable housing there is a possible supply of just 307 new affordable dwellings per annum. If we were to assume that the past gross affordable housing provision of 25% is to be continued over the next five years, this is likely to deliver only 1,281 affordable dwellings over the period, equating to a much lower affordable housing future supply of just 256 new affordable dwellings per annum.
- 8.27 Consequently, there is a substantial need for more affordable housing now. In light of the Council's poor record of affordable housing delivery and the volatility of future affordable housing delivery there can be no doubt that the provision of up to 24 affordable dwellings on this site to address the District-wide needs of Mid Sussex should be afforded **very substantial weight** in the determination of this appeal.

Council's Assessment of the Application

Section 9

Introduction

- 9.1 This section of the evidence considers the Council's Assessment of the appeal proposals during the course of the application and the appeal process.

Committee/Officer Report

- 9.2 The application was refused in September 2025 (**CD3.2**) by Mid Sussex Planning Committee. The Planning Committee Report can be seen under **CD3.3** which recommended the application for approval.
- 9.3 Paragraph 2.12 reports the policy compliance affordable housing delivery (30%) and states *"it is considered that the provision of this accommodation should be given substantial positive weight in the planning balance"*.
- 9.4 With regards to the planning balance exercise, the report sets out at paragraph 2.22:

"It is considered that the significant public benefits of the scheme (provision of new housing, including affordable housing, the economic benefits including construction jobs and additional spending in the locality), outweigh the less than substantial harm to the setting of the heritage assets in this instance".

- 9.5 It goes on to conclude (paragraph 2.23):

"In summary, it is for the decision maker to consider the weight that should be attached to these issues, individually and collectively".

LPA Council Statement of Case

- 9.6 The Council submitted their Statement of Case ("SoC") in respect of the appeal proposals to the Inspectorate in April 2026 which can be viewed under **CD10.1**.
- 9.7 It is disappointing that the only consideration of the provision of affordable housing is set out at paragraph 7.49 with the Council acknowledging the potential benefits of the scheme as provision of new housing, including affordable housing.
- 9.8 Whilst the Council does identify the provision of affordable housing as a potential scheme benefit, there is no mention of the specific benefits of the delivery of up to 24

affordable homes as part of this scheme nor the level of detail on past delivery record (poor) and the future affordable housing supply (inadequate).

- 9.9 Therefore, it does not appear that this specific benefit in its own right has been properly considered by the Council as part of the planning balance exercise. Section 2 of my Proof of Evidence, and associated appendices, set out why affordable housing is an important material consideration that should be weighed in the planning balance. Furthermore, as explained further in Section 10 and **Appendix JS6**, many appeal decisions do recognise affordable housing as an individual benefit with its own weight in the planning balance.

Signed Statement of Common Ground - CD8.1

- 9.10 On 5 May 2026 the main parties agreed a SoCG. This has been helpful to establish some of the key affordability challenges being faced by residents in Mid-Sussex.
- 9.11 In terms of the points agreed relating to affordable housing, these are set out at Section 6 (paragraphs 6.3 – 6.15). Following receipt of the 2026 FOI response on 15 May (after the SoCG was signed) a number of the affordability indicators and levels of delivery have been able to be updated. These are captured in a separate Affordable Housing SoCG (**CD8.4**) (discussed further below).
- 9.12 The key matters agreed, not superseded by the AH SoCG, contained with the SoCG are as follows:
- *It is agreed that there is an acute national housing crisis.*
 - *There is agreement that Policy DP31 of the Mid-Sussex District Plan 2014-2031 (adopted March 20218) is drafted to capture a benefit and is not needed in mitigation or to ward off a harm.*
 - *The Council's latest assessment of affordable housing need is set out in the Mid-Sussex SHMA Update (October 2024). It is agreed that Table 3.4 estimates an annual net need from households unable to buy or rent of 383 affordable dwellings over the period 2021 – 2040. It is agreed that this figure should be treated as a minimum as it does not include any allowance for the need for affordable home ownership.*
 - *In terms of affordability, it is agreed that both the 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) (ONS data).*

- *Median house prices in Mid-Sussex reached £435,000 in 2025, almost double the 2006 level and for the MSOA (Middle Super Output Area) where the site is located (Mid-Sussex 008) there has been an even greater increase of 105% since 2006. The median house price for Mid-Sussex MSOA 008 is now £517,000.*
- *It is agreed that there has been a similar level of increase in lower quartile house prices. These have increased by 95% since 2006 now standing at £340,000 and for the MSOA are currently £397,000 (92% increase since 2006).*
- *There is agreement that both the median and lower quartile house prices for Mid-Sussex are significantly higher than both the national and regional averages.*
- *It is agreed that there is an on-going and pressing need for affordable housing in Mid-Sussex.*
- *It is agreed that the benefit of affordable housing is a material consideration weighting in favour of the development.*

Affordable Housing Statement of Common Ground (SoCG) – CD8.4

- 9.13 In addition to the main SoCG, and to reflect updated information received since the main SoCG was signed, an Affordable Housing specific SoCG has been agreed (signed 19 June 2026).
- 9.14 Figure 4 of the Affordable Housing SoCG provided an update on the affordability indicators to show what had changed since the main SoCG was signed. The updated points agreed are as follows:

Figure 9.1: Updated Affordability Indictors from Affordable Housing SoCG

Affordability Indicators	Latest Position
Council's Housing Register	As of 31 March 2026, there were 2,441 households on the Housing Register, an increase of 6% from 2,468 households on 31 March 2025.
Temporary Accommodation	As of 31 March, Mid Sussex District Council housed 43 households in Temporary Accommodation. Of these, 29 households were housed in Mid Sussex and 14 households (33%) were housed outside the District.
House prices	The lower quartile house price in the Mid Sussex 008 MSOA is £397,000 in 2025, an increase of 50% from 2014.

9.15 In addition, the following points were also agreed in the Affordable Housing SoCG:

- *“It is agreed that there have not been enough affordable homes built per year and there isn’t sufficient affordable housing in Mid Sussex.*
- *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 to seek to address the backlog within the next five years.*
- *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-makers scale, which for the Council, is substantial and for the Appellant is very substantial”.*

Mid Sussex Letter to the Planning Inspectorate 2 June 2026 – CD10.2

9.16 The letter from Mid Sussex explained that in response to the Local Plan Inspectors request for the Council to increase the planned number of houses to support the unmet needs of adjacent Authorities (namely Crawley and Brighton and Hove), a long list of additional sites (subject to in-combination testing) has been identified which includes the appeal site.

9.17 Although the long list of sites are now subject to in-combination testing and will be subject to further consultation, the fact that the site has been included on the long list *“indicates an in-principle acceptance by the Council that the conflicts with policy previously identified in the decision notice are now outweighed by the need for the additional contribution to meeting the needs of neighbouring Authorities which the District Plan Inspector is asking Mid Sussex to make”.*

9.18 Therefore, in light of the above, the Council concludes *“it is no longer appropriate to resist the grant of planning permission on the appeal site...it will not be defending the reasons for refusal and will not be submitted evidence to the Inquiry on those matters”.*

9.19 The suggestion from the Council is that an updated SoCG is prepared to reflect this latest position.

Rule 6 Party Updated Statement of Case – On Behalf of Protect Colwell Farm Action Group – CD11.1

9.20 Protect Colwell Farm Action Group is a Rule 6 Party and submitted a SoC in respect of this appeal to the Inspectorate on 19 May 2026.

- 9.21 The Rule 6 SoC only makes one reference to affordable housing and that is in listing Development Policies. Therefore, it is unclear how the Rule 6 Party is able to conclude at paragraph 4.4 that the adverse impacts of the proposal significantly and demonstrably outweigh the benefits, as there has been no consideration of the benefits (i.e. affordable housing) to feed into this balancing exercise.
- 9.22 In addition, the Rule 6 Party considers at paragraph 4.3 that the 5YHLS shortfall will be addressed through the adoption of the emerging Local Plan which they say is imminent.
- 9.23 However, as demonstrated in Section 8, it is unlikely that the Council will deliver sufficient levels of affordable housing to meet future needs over the next five years.

Summary and Conclusions

- 9.24 Whilst the Council do agree that a lack of affordable housing is an issue for Mid Sussex, I do not consider that the Council has sufficiently assessed the substantial affordable housing benefits that the scheme would achieve and downplays its impact on helping local people in need of affordable housing.
- 9.25 The acute level of affordable housing need in Mid Sussex, coupled with a persistent lack of delivery and worsening affordability, will detrimentally affect the ability of people to lead the best lives they can. Whilst I do not challenge the right of objectors to oppose unwelcome development, it is a stark aspect of my experience of almost all of the inquiries in which I have given evidence, that those in housing need never attend to explain exactly why they need additional housing and the consequences of not providing it.
- 9.26 In my opinion, the Council has thus far sought to downplay the provision of up to 24 affordable homes at the appeal site in its Statement of Case. It is my view that affordable housing is an individual benefit of the appeal proposals which should be afforded **very substantial positive weight** in the determination of this appeal.

Benefits of the Proposed Affordable Housing at the Appeal Site

Section 10

Introduction

- 10.1 The Government attaches weight to achieving a turnaround in affordability to help meet affordable housing needs. The NPPF is clear that the Government seeks to significantly boost the supply of housing, which includes affordable housing.
- 10.2 As set out in the previous sections there are significant social and economic consequences for failing to meet affordable housing needs at both national and Local Authority level. Mid Sussex is no exception to this.
- 10.3 The appeal scheme will provide up to 24 affordable dwellings on site. Whilst the precise size and tenure breakdown will be agreed as part of subsequent Reserved Matters application(s), the starting point will be tenure split comprising 75% social/affordable rented (up to 60 dwellings) and 25% First Homes (20 dwellings). The wider social and economic benefits of affordable housing per se are commonly recognised.
- 10.4 As set out in Section 2 of this evidence, the benefit of affordable housing is a strong material consideration in support of development proposals.

Benefits of the proposed Affordable Housing at the appeal site

- 10.5 The offer meets the requirements of adopted Policy DP31 (30%) of the District Plan. It should be noted that these policies were drafted to capture a benefit rather than to ward off harm or be needed in mitigation.
- 10.6 This fact was acknowledged by the Inspector presiding over two appeals on land to the west of Langton Road, Norton (**CD12.6**) in September 2018 who was clear at paragraph 72 of their decision that:

“[I]n the light of the Council’s track record, the proposals’ full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view,

compliance with policy is beneficial and full compliance as here, when others have only achieved partial compliance, would be a considerable benefit” (my emphasis).

- 10.7 Similarly, as recognised in the Coalpit Heath, South Gloucestershire appeal decision **(CD12.16, p.13, [61])**, where I gave evidence, separate weight should be attributed to the different components of housing that make up a scheme and the benefits of such should not be dismissed if provision is just policy compliant. The Inspector presiding over that appeal concluded at paragraph 61:

“There are three different components of housing that would be delivered: market housing, affordable housing (AH) and custom-build housing (CBH). They are all important and substantial weight should be attached to each component for the reasons raised in evidence by the Appellants, which was not substantially challenged, by the Council, albeit they all form part of the overall housing requirement and supply. The fact that the much needed AH and CBH are elements that are no more than that required by policy is irrelevant – they would still comprise significant social benefits that merit substantial weight”.

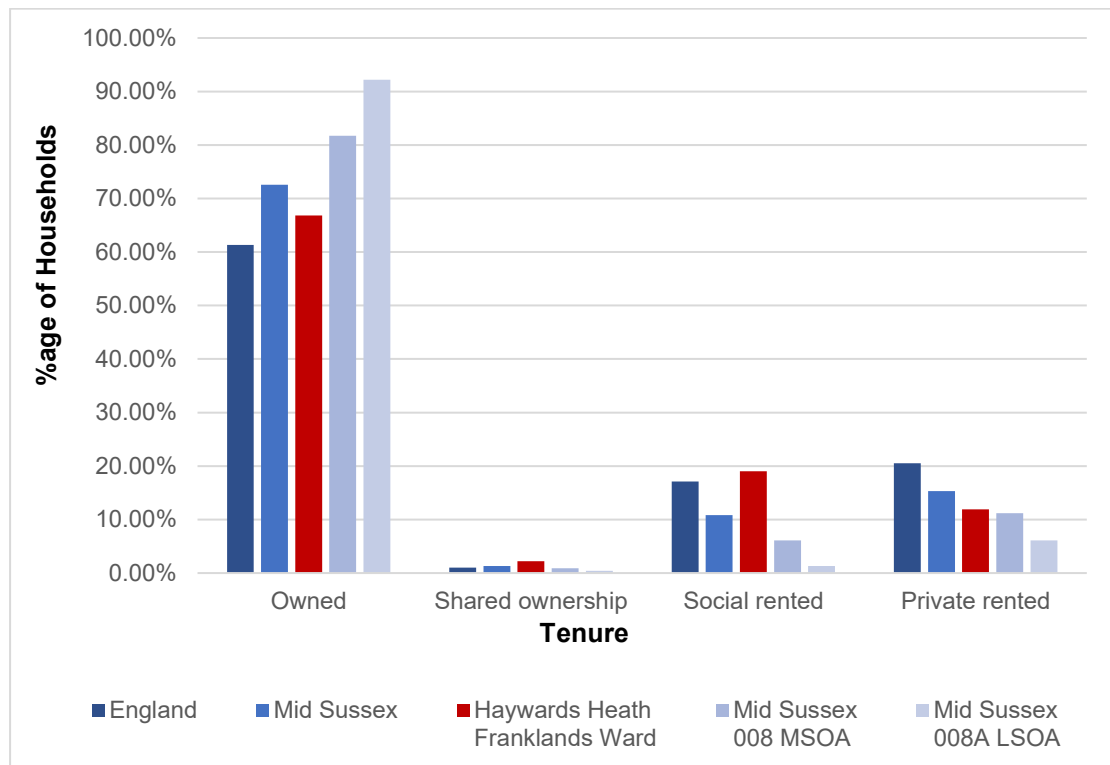
- 10.8 The benefits of the proposed affordable homes at the appeal site should, therefore, be independently weighed within the planning balance to ensure that its distinct contribution in addressing housing needs is fully appreciated.
- 10.9 Figure 10.1 below illustrates the breakdown of tenures within Mid Sussex, Haywards Heath Franklands Ward, Mid Sussex 008 MSOA¹⁵, Mid Sussex 008A LSOA¹⁶ compared with that nationally at the time of the 2021 Census.

*****Continued Overleaf*****

¹⁵ Middle Super Output Area

¹⁶ Lower Super Output Area

Figure 10.1: Tenure comparison across England, Mid Sussex, Haywards Heath Franklands Ward, Mid Sussex 008 MSOA and Mid Sussex 008A LSOA 2021



Source: Census 2021. Chart excludes households 'living rent free' as this accounts for <0.2% of households at all geographic levels).

10.10 Figure 10.1 clearly shows that at the time of the Census 2021, owner occupation was by far the most common tenure in Mid Sussex (72.6%), the Mid Sussex 008 MSOA (81.7%) and the Mid Sussex 008A LSOA (92.2%). Note that owner occupation is much more prevalent at LSOA and MSOA level than at the District level.

10.11 When understanding the composition of the remaining housing stock in these areas, shared ownership properties are by far the most uncommon, representing just 1.3% at District level. Worse still, there are just 44 shared ownership dwellings in the MSOA equal to 0.9% of stock and only two shared ownership dwellings in the LSOA.

10.12 The MSOA and LSOA also have a very low provision of social/affordable rented homes at just 6.1% (286 dwellings) and 1.3% (7 dwellings) respectively.

10.13 The affordable housing benefits of the appeal scheme are therefore:

- Policy compliant offer of 30% (up to 24 dwellings) of the scheme provided as affordable housing;
- An addition of up to 60 social/affordable rent tenure homes;

- An addition of up to 20 First Homes tenure homes;
- A deliverable scheme which provides much needed affordable homes;
- Addressing the polarised tenure profile of the District, delivering a broader mix of tenures to provide a more balanced community and to enhance its vitality;
- Which provide better quality affordable homes with benefits such as improved energy efficiency and insulation¹⁷.

10.14 In my opinion these benefits are substantial and a strong material consideration weighing heavily in favour of the proposal.

Summary and Conclusions

10.15 I do not consider that the Council have sufficiently assessed the substantial affordable housing benefits that the scheme would achieve.

10.16 The acute level of affordable housing need in Mid Sussex, coupled with a persistent lack of delivery and worsening affordability, will detrimentally affect the ability of people to lead the best lives they can.

10.17 In my opinion, the Council have deliberately sought to downplay the provision of up to 24 affordable homes at the appeal site. It is my view that affordable housing is an individual benefit of the appeal proposals which should be afforded **very substantial weight** in the determination of this appeal.

¹⁷ Watt a Save by HBF – October 2022.

The Weight to be Attributed to the Proposed Affordable Housing Provision

Section 11

- 11.1 The NPPF is clear at paragraph 32 that policies should be underpinned by relevant up-to-date evidence which is adequate and proportionate and considers relevant market signals.
- 11.2 Paragraph 61 of the NPPF sets out the Government's clear objective of *"significantly boosting the supply of homes"* before explaining that *"The overall aim should be to meet an area's identified housing need"*.
- 11.3 Furthermore, paragraph 62 requires 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."* (My emphasis).
- 11.4 The NPPF requires Local Authorities at paragraph 63 to assess and reflect in planning policies the size, type and tenure of housing needed for different groups, *"including those who require affordable housing"*. This is re-iterated in the draft NPPF.
- 11.5 In terms of considering the issue of meeting affordable housing needs and the associated benefits is an appeal decision for the development for 71 dwellings, including affordable provision at 40%, equal to 28 affordable dwellings on site at Hawkhurst in Kent (**CD12.8**) in March 2022. In critiquing the Council's views regarding the affordable housing benefits of the scheme, the Inspector made the following comments:

"The Council are of the view that the housing benefits of the scheme are 'generic' and would apply to all similar schemes. However, in my view, this underplays the clear need in the NPPF to meet housing needs and the Council's acceptance that greenfield sites in the AONB are likely to be needed to meet such needs. Further, I agree with the appellant that a lack of affordable housing impacts on the most vulnerable people in the borough, who are unlikely to describe their needs as generic." (Paragraph 118)

- 11.6 I agree, the recipients of 24 homes here will not describe their needs as generic.

- 11.7 Considering the Authority's past poor record of affordable housing delivery, the inability of the future supply to instigate a step change in delivery and high and rising numbers of households on the Housing Register, there can be no doubt in my mind that the provision of up to 24 affordable dwellings on this site should be afforded **very substantial weight** in the determination of this appeal.

Relevant Secretary of State and Appeal Decisions

- 11.8 The importance of affordable housing as a material consideration has been reflected in several Secretary of State ("SoS") and appeal decisions.
- 11.9 Of particular interest is the amount of weight which has been afforded to affordable housing relative to other material considerations; many decisions recognise affordable housing as an individual benefit with its own weight in the planning balance. A collection of such SoS decisions can be viewed at **Appendix JS6**.
- 11.10 Brief summaries of appeal decisions relevant to this appeal are summarised at **Appendix JS7**.
- 11.11 Some of the key points I would highlight from these examples are that:
- Affordable housing is an important material consideration;
 - The importance of unmet need for affordable housing being met immediately;
 - Planning Inspectors and the Secretary of State have attached substantial weight and very substantial weight to the provision of affordable housing; and
 - Even where there is a five-year housing land supply the benefit of a scheme's provision of affordable housing can weigh heavily in favour of development.

Summary and Conclusion

- 11.12 There is a wealth of evidence to demonstrate that there is a national housing crisis in the UK affecting many millions of people who are unable to access suitable accommodation to meet their housing needs.
- 11.13 What is clear is that a significant boost in the delivery of housing, and in particular affordable housing, in England is essential to arrest the housing crisis and prevent further worsening of the situation.
- 11.14 Market signals indicate a worsening trend in affordability across Mid Sussex and, by any measure of affordability, this is an Authority amid an affordable housing

emergency, and one through which urgent action must be taken to deliver more affordable homes.

- 11.15 Against the scale of unmet need and the lack of suitable alternatives in the private rented sector across Mid Sussex, there is no doubt in my mind that the provision of up to 24 affordable homes will make a substantial contribution. Considering all the evidence I consider that this contribution should be afforded **very substantial weight** in the determination of this appeal.

Appendix JS1

Freedom of Information Response 2025



From: [Freedom of Information](#)
To: [Leonie Stoate](#)
Subject: RE: Housing Data Ref: R316909
Date: 01 October 2025 10:43:30
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[Q 12 to 15.xlsx](#)
[q1-11.xlsx](#)

Dear Leonie,

Thank you for your request, which has been dealt with under the Freedom of Information Act ("the Act").

I can confirm that the information you have requested is held by the Council and has been provided as an attachment.

If you are unhappy with how we have handled your request, you may ask for an internal review by contacting Julie Galvin, Assistant Director Governance, at Mid Sussex District Council, Oaklands, Oaklands Road, Haywards Heath, West Sussex, RH16 1SS, email: julie.galvin@midsussex.gov.uk, and quoting your Reference Number (contained in the subject bar),. You have a maximum of 40 working days in which to request a review.

If you still remain dissatisfied with the response you can complain to the Information Commissioner - details available at: <https://ico.org.uk/concerns/>.

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Kind Regards,

FOI/EIR Team

Governance

foi@midsussex.gov.uk

Working together for a better Mid Sussex

From: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>

Sent: 28 August 2025 15:25

To: Freedom of Information <foi@midsussex.gov.uk>

Cc: James Stacey <James.Stacey@tetlow-king.co.uk>

Subject: Housing Data

You don't often get email from leonie.stoate@tetlow-king.co.uk. [Learn why this is important](#)

Dear Sir / Madam,

I hope this email finds you well. I write to you to make a request under the Freedom of

Information Act 2000 in respect of housing matters in Haywards Heath Civil Parish, as well as the Mid Sussex District Council area.

Please see below the FOI request. Please let me know if you have any queries or require any clarification. I look forward to hearing from you within the relevant timescales.

Confirmation of receipt would be greatly appreciated.

Freedom of Information Request

Questions 1 to 11 of this request relate to data held by the Housing Department.
Questions 12 to 15 of this request relate to data held by the Planning Department.

Housing Register

1. The total number of households on the Council's Housing Register on 31 March 2025.
2. The average waiting times on 31 March 2025 for the following types of affordable property across the Authority:
 - a. 1-bed affordable dwelling;
 - b. 2-bed affordable dwelling;
 - c. 3-bed affordable dwelling; and
 - d. A 4+ bed affordable dwelling.
3. The average waiting times on 31 March 2024 for the following types of affordable property across the Authority:
 - a. 1-bed affordable dwelling;
 - b. 2-bed affordable dwelling;
 - c. 3-bed affordable dwelling; and
 - d. A 4+ bed affordable dwelling.
4. The total number of households on the Council's Housing Register on 31 March 2025 specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2025)
Haywards Heath Civil Parish	

5. The number of properties advertised, and the average number of bids per property over the 2024/25 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Haywards Heath Civil Parish	
	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling		
2-bed affordable dwelling		
3-bed affordable dwelling		
4+ bed affordable dwelling		

6. Any changes the Council has made to its Housing Register Allocations Policy since 2011 including:

- The date they occurred;
- What they entailed; and
- Copies of the respective documents

- **Social Housing Stock**

7. The total number of social housing dwelling stock on 31 March 2025 in the following locations:

Location	Total Social Housing Stock (31 March 2025)
Haywards Heath Civil Parish	

Social Housing Lettings

8. The number of social housing lettings in the period between 1 April 2024 and 31 March 2025; and between 1 April 2023 and 31 March 2024 in the following locations:

-

Location	Social Housing Lettings	
	1 April 2024 to 31 March 2025	1 April 2023 to 31 March 2024
Haywards Heath Civil Parish		

- **Temporary Accommodation**

9. The number of households housed in temporary accommodation within and outside the LPA region on the following dates:

Households in Temporary Accommodation	31 March 2025	31 March 2024
Households Housed within Mid Sussex District		
Households Housed outside Mid Sussex District		
Total Households		

10. The amount of money spent on temporary accommodation per household within the Mid Sussex District area over the following periods:

- 1 April 2024 to 31 March 2025.

11. The amount of money spent on temporary accommodation per household outside the Mid Sussex District area over the following periods:

- 1 April 2024 to 31 March 2025.

Housing Completions

12. The number of NET housing completions in the Mid Sussex District area broken down on a per annum basis for the period between 2000/01 and 2024/25.

13. The number of NET affordable housing completions in the Mid Sussex District area broken down on a per annum basis for the period between 2000/01 and 2024/25.
14. The number of NET housing completions in Haywards Heath Civil Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.
15. The number of NET affordable housing completions in Haywards Heath Civil Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.

Glossary of Terms

Housing Register	The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home.
Affordable Property	Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions: a. Social rent; b. Other affordable housing for rent; c. Discounted market sales housing; and d. Other affordable routes to home ownership.
Housing Completion	A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.
Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period	From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

I look forward to hearing from you. If there are any issues with providing any of the data then please get in touch.

Kind regards,

Leonie Stoate BSc (Hons) MSc MRTPI
Principal Planner
 TETLOW KING PLANNING



E: leonie.stoate@tetlow-king.co.uk

T: 0117 9561916

M: 07517 106104

W: tetlow-king.co.uk



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From: [Freedom of Information](#)
To: [Leonie Stoate](#)
Subject: RE: Housing Data Ref: R316909
Date: 16 October 2025 13:36:26
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[Completions 2011 for web.pdf](#)
[Completions 2006-07 by parish.pdf](#)
[Q 13 & 15.xlsx](#)

Dear Leonie,

Thank you for your clarification. It appears that when collating information some has been left out for questions 12-15. This has now been provided below and where necessary attached. Some changes have also been made to the spreadsheet for clarity.

RESPONSE:

Q12

The Authorities Monitoring Report's published on the web site have this information. (Note that the Report for 2004-05 also include data for 2000/01). [Consultation & Monitoring - Mid Sussex District Council](#)

Data for 2024/25 is not yet available.

Q13

See Spreadsheet

Q14

Data for 2024/25 is not yet available.

List of completions by parish is published on the web site for years 2023/24 – 2011/12

[Consultation & Monitoring - Mid Sussex District Council](#)

Data for 2010/11 is attached

Data for 2009/10 [Monitoring Report 2009-2010](#) appendix 2

Data for 2008/09 [Monitoring Report 2008-2009 Addendum](#) appendix 2

Data for 2007/08 [Monitoring Report 2007-2008](#) appendix 2

Data for 2006/07 is attached

Data for 2005/06 [Monitoring Report 2005-2006](#) appendix 2

Data for 2004/05 [Monitoring Report 2004-2005](#) appendix 2

We do not hold this information for 2000/01 – 2003/04.

Q15

See Spreadsheet

If you are unhappy with how we have handled your request, you may ask for an internal review by contacting Julie Galvin , Assistant Director Governance, at Mid Sussex District Council, Oaklands, Oaklands Road, Haywards Heath, West Sussex, RH16 1SS, email: julie.galvin@midsussex.gov.uk, and quoting your Reference Number (contained in the subject bar),. You have a maximum of 40 working days in which to request a review.

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Kind Regards,

FOI/EIR Team

Governance

foi@midsussex.gov.uk

Working together for a better Mid Sussex

From: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>

Sent: 07 October 2025 18:06

To: Freedom of Information <foi@midsussex.gov.uk>

Subject: RE: Housing Data Ref: R316909

Good afternoon,

Thank you for the response, much appreciated.

Would you please be able to clarify if the attachment titled 'Q12-15' contains the overall delivery figures or the affordable housing delivery figures for the respective areas?

Additionally, given the request asked for both, could I please request that both overall and affordable delivery is provided for both the authority and parish level?

Kind regards,

Leonie Stoate BSc (Hons) MSc MRTPI
Principal Planner
TETLOW KING PLANNING

TK_logo



E: leonie.stoate@tetlow-king.co.uk **T:** 0117 9561916 **M:** 07517 106104 **W:** tetlow-king.co.uk

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From: Freedom of Information <foi@midsussex.gov.uk>
Sent: 01 October 2025 10:43
To: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>
Subject: RE: Housing Data Ref: R316909

Dear Leonie,

Thank you for your request, which has been dealt with under the Freedom of Information Act ("the Act").

I can confirm that the information you have requested is held by the Council and has been provided as an attachment.

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Kind Regards,

FOI/EIR Team

Governance

foi@midsussex.gov.uk

Working together for a better Mid Sussex

From: Leonie Stoate <Leonie.Stoate@tetlow-king.co.uk>
Sent: 28 August 2025 15:25
To: Freedom of Information <foi@midsussex.gov.uk>
Cc: James Stacey <James.Stacey@tetlow-king.co.uk>
Subject: Housing Data

You don't often get email from leonie.stoate@tetlow-king.co.uk. [Learn why this is important](#)

Dear Sir / Madam,

I hope this email finds you well. I write to you to make a request under the Freedom of Information Act 2000 in respect of housing matters in Haywards Heath Civil Parish, as well as the Mid Sussex District Council area.

Please see below the FOI request. Please let me know if you have any queries or require

any clarification. I look forward to hearing from you within the relevant timescales.

Confirmation of receipt would be greatly appreciated.

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Questions 12 to 15 of this request relate to data held by the Planning Department.

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 - d. A 4+ bed affordable dwelling.
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Type of affordable property	Haywards Heath Civil Parish	
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Location	Social Housing Lettings	
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Haywards Heath Civil Parish		

Temporary Accommodation

9. The number of households housed in temporary accommodation within and outside the LPA region on the following dates:

Households in Temporary Accommodation	31 March 2025	31 March 2024
Households Housed within Mid Sussex District		
Households Housed outside Mid Sussex District		
Total Households		

10. The amount of money spent on temporary accommodation per household within the Mid Sussex District area over the following periods:
- 1 April 2024 to 31 March 2025.
11. The amount of money spent on temporary accommodation per household outside the Mid Sussex District area over the following periods:
- 1 April 2024 to 31 March 2025.

Housing Completions

12. The number of NET housing completions in the Mid Sussex District area broken down on a per annum basis for the period between 2000/01 and 2024/25.
13. The number of NET affordable housing completions in the Mid Sussex District area broken down on a per annum basis for the period between 2000/01 and 2024/25.

14. The number of NET housing completions in Haywards Heath Civil Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.
15. The number of NET affordable housing completions in Haywards Heath Civil Parish broken down on a per annum basis for the period between 2000/01 and 2024/25.

Glossary of Terms

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Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
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Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

I look forward to hearing from you. If there are any issues with providing any of the data then please get in touch.

Kind regards,

Leonie Stoate BSc (Hons) MSc MRTPI
Principal Planner
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W: tetlow-king.co.uk



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1	The total number of households on the Council's Housing Register on 31 March 2025.	2,468	
2	The average waiting times on <u>31 March 2025</u> for the following types of affordable property across the Authority		
	1 bed affordable dwelling	383 days	
	2 bed affordable dwelling	333 days	
	3 bed affordable dwelling	694 days	
	4 bed affordable dwelling	766 days	
3	The average waiting times on <u>31 March 2024</u> for the following types of affordable property across the Authority		
	1 bed affordable dwelling	437 days	
	2 bed affordable dwelling	378 days	
	3 bed affordable dwelling	477 days	
	4 bed affordable dwelling	392 days	
4	The total number of households on the Council's Housing Register on <u>31 March 2025</u> specifying Haywards Heath Civil Parish as their preferred choice of location	This information is not held as at 31/03/25. As at 30/09/25, 709 households had expressed that Haywards Heath was their first choice.	
5	1. The number of properties advertised, and the average number of bids per property over <u>the 2024/25 monitoring period</u> for the following types of affordable property in Haywards Heath Civil Parish:	Number of properties advertised	Average Bids per Property
	1-bed affordable dwelling	22	Unable to calculate
	2-bed affordable dwelling	23	
	3-bed affordable dwelling	16	
	4+ bed affordable dwelling	1	

6	Any changes the Council has made to its Housing Register Allocations Policy since 2011 including	Mid Sussex District Council amended its allocation scheme in June 2025. Copies of the scheme can be found on our website Housing Allocation Scheme - Mid Sussex District Council . Prior to this, the last amendment was 2018	
7	The total number of social housing dwelling stock on 31 March 2025 in Haywards Heath Civil Parish:	This information is not recorded. As at October 2024, the number was 2022	
8	The number of social housing lettings in the period between 1 April 2024 and 31 March 2025; and between 1 April 2023 and 31 March 2024 in Haywards Heath Civil Parish	31/03/2025	31/03/2024
		67	44
9	The number of households housed in temporary accommodation within and outside the LPA region on the following dates	31/03/2025	31/03/2024
	Households Housed within Mid Sussex District	49	64
	Households Housed outside Mid Sussex District	55	21
	Total Households	104	85
10	The amount of money spent on temporary accommodation per household within the Mid Sussex District area 01/04/24 - 31/03/25	We do not record temporary accommodation apend by area. We record net spend on nightly paid accommodation	

11	The amount of money spent on temporary accommodation per household within the Mid Sussex District area 01/04/23 - 31/03/24	We do not record temporary accommodation apend by area. We record net spend on nightly paid accommodation
----	--	---

	Overall Housing Completions	
Year	Mid Sussex	HHCP
2000/01	295	
2001/02	422	
2002/03	290	
2003/04	597	
2004/05	458	
2005/06	611	
2006/07	337	
2007/08	502	
2008/09	480	
2009/10	353	
2010/11	179	
2011/12	522	
2012/13	749	
2013/14	536	
2014/15	630	
2015/16	868	
2016/17	912	
2017/18	843	
2018/19	661	
2019/20	1003	
2020/21	1116	
2021/22	1187	
2022/23	1053	
2023/24	1247	
2024/25	N/A	
Total	13,178	0

	Affordable Completions	
Year	Mid Sussex	HHCP
2000/01	N/A	N/A
2001/02	N/A	N/A
2002/03	N/A	N/A
2003/04	N/A	N/A
2004/05	N/A	N/A
2005/06	N/A	N/A
2006/07	73	46
2007/08	105	16
2008/09	158	54
2009/10	157	0
2010/11	85	0
2011/12	202	62
2012/13	108	51
2013/14	126	27
2014/15	221	17
2015/16	113	39
2016/17	176	49
2017/18	97	14
2018/19	102	30
2019/20	214	85
2020/21	245	55
2021/22	349	33
2022/23	369	91
2023/24	299	11
2024/25	313	4
Total	3512	684

Appendix JS2

Freedom of Information Response 2026



From: [Freedom of Information](#)
To: [Lisa Luong](#)
Subject: RE: Housing Data / Our Ref R339192
Date: 15 May 2026 14:08:11
Attachments: [image001.png](#)
[image002.jpg](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Dear Lisa,

Thank you for your request, which has been dealt with under the Freedom of Information Act ("the Act").

Please see the Council's response below.

Housing Register

-
1. The total number of households on the Council's Housing Register on 31 March 2026. **The total number of households on Mid Sussex was 2613.**
 2. The average waiting times on 31 March 2026 for the following types of affordable property across the Authority: **This is the average of all properties let through the social housing register**
 - a. 1-bed affordable dwelling; **433 days**
 - b. 2-bed affordable dwelling; **319 days**
 - c. 3-bed affordable dwelling; and **491 days**
 - d. A 4+ bed affordable dwelling. **1191 days**
 3. Of those households on the Housing Register, how many are recorded as having a Local Connection to Mid Sussex based on the different Local Connection criteria as of 14 May 2026? **We cannot provide a total as a and b could both apply**

Local Connection Criteria (Paragraph 11.2 of the June 2025 Housing Allocations Policy)	Number of Households on the Housing Register
a. Resides in the District as their only or principal home and has done so continuously for the previous 2 years.	1881
b. Is in paid employment in the District (16hrs or more per week) and has been continuously for the previous 2 years.	850
c. Has close relatives who reside in the District as their only principal home and have done for at least	We are unable to report this as it is an

the previous 5 years (or the previous 2 years if the Applicant is aged 65 or over) where the Council considered that it is necessary for the Applicant to be accommodated within the District in order to provide or receive significant and essential medical or social support to/from the relative.	assessment of support needs
d. Is a care leaver who is owed a continuing duty under s.23C of the Children Act 1989 by West Sussex County Council; or is owed that duty by another Authority but has resided in Mid Sussex for at least two years; some or all of which falls before they turn 16.	2
Total Households	N/A

4. The total number of households on the Council's Housing Register on 31 March 2026 or date most recently recorded (please confirm the time period used) specifying the following locations as their preferred choice of location: **This figure is as at 14/05/26**

Location	Household Preferences (14 May 2026)
Haywards Heath Civil Parish	672

5. The number of properties advertised, and the average number of bids per property over the 2025/26 monitoring period for the following types of affordable property in the locations listed below: **This information is not recorded**

Type of affordable property	Haywards Heath Civil Parish	
	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling		
2-bed affordable dwelling		
3-bed affordable dwelling		
4+ bed affordable dwelling		

-

Social Housing Stock

6. The total number of social housing dwelling stock on 31 March 2025 in the following locations: **To clarify, this is rented social housing and could be affordable or social rent. This is set by the Registered Social Landlord.**

Location	Total Social Housing Stock (31 March 2025)
Haywards Heath Civil Parish	1947

Social Housing Lettings

7. The number of social housing lettings in the period between 1 April 2025 and 31 March 2026 in the following locations: **This is the total number of lettings through the housing register as affordable or social rent is not recorded**

Location	Social Housing Lettings
	1 April 2025 to 31 March 2026
Haywards Heath Civil Parish	77

Temporary Accommodation

8. The number of households on the Housing Register housed in temporary accommodation within and outside the Mid Sussex area on the following dates:

Households in Temporary Accommodation	31 March 2026
Households Housed within Mid Sussex	29
Households Housed outside Mid Sussex	14
Total Households	43

In response to Q9 and Q11 “Number of Net Housing Completions” in Mid Sussex and Haywards Heath respectively, this information is available on our website at <https://www.midsussex.gov.uk/planning-building/consultation-monitoring/> under “Housing Land Supply”. The data is provided for every year to 2023/24; the 2024/25 and 2025/26 data is due to be uploaded within the next few days. It is set out by settlement. Note that we do not hold information previous to this.

In response to Q10 and Q12 “Number of Net Affordable Housing Completions”, please see table below:

Monitoring Year	Mid Sussex Affordable Housing Completions	Haywards Heath CP Affordable Housing Completions
2000/01	Information not held	Information not held

2001/02	Information not held	Information not held
2002/03	Information not held	Information not held
2003/04	Information not held	Information not held
2004/05	Information not held	Information not held
2005/06	Information not held	Information not held
2006/07	73	46
2007/08	105	17
2008/09	158	54
2009/10	157	0
2010/11	85	0
2011/12	202	62
2012/13	108	51
2013/14	126	27
2014/15	221	17
2015/16	113	29
2016/17	176	30
2017/18	97	4
2018/19	102	11
2019/20	214	71
2020/21	245	10
2021/22	349	20
2022/23	369	44
2023/24	300	11
2024/25	324	4
2024/26	373	0
Totals		508

Please be advised that third-party personal data has been redacted under Section 40(2) of the Freedom of Information Act.

If you are unhappy with how we have handled your request, you may ask for an internal review by contacting Julie Galvin , Assistant Director Governance, at Mid Sussex District Council, Oaklands, Oaklands Road, Haywards Heath, West Sussex, RH16 1SS, email: julie.galvin@midsussex.gov.uk, and quoting your Reference Number (contained in the subject bar),. You have a maximum of 40 working days in which to request a review.

If you still remain dissatisfied with the response you can complain to the Information Commissioner - details available at: <https://ico.org.uk/concerns/>.

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Kind Regards,

FOI/EIR Team

Governance

foi@midsussex.gov.uk

From: Lisa Luong <lisa.luong@tetlow-king.co.uk>

Sent: 16 April 2026 16:41

To: Freedom of Information <foi@midsussex.gov.uk>

Cc: Amy James <amy.james@tetlow-king.co.uk>; James Stacey <James.Stacey@tetlow-king.co.uk>

Subject: Housing Data

You don't often get email from lisa.luong@tetlow-king.co.uk. [Learn why this is important](#)

Dear Sir / Madam,

I hope this email finds you well. I write to you to make a request under the Freedom of Information Act 2000 in respect of housing matters in Haywards Heath Civil Parish, as well as the Mid Sussex District Council area.

Please see below the FOI request. Please let me know if you have any queries or require any clarification. I look forward to hearing from you within the relevant timescales.

Questions 1 to 8 of this request relate to data held by the Housing Department.

Questions 9 to 12 of this request relate to data held by the Planning Department.

-

Housing Register

-

1. The total number of households on the Council's Housing Register on 31 March 2026.
2. The average waiting times on 31 March 2026 for the following types of affordable property across the Authority:

- a. 1-bed affordable dwelling;
- b. 2-bed affordable dwelling;
- c. 3-bed affordable dwelling; and
- d. A 4+ bed affordable dwelling.

3. Of those households on the Housing Register, how many are recorded as having a Local Connection to Mid Sussex based on the different Local Connection criteria as of 31 March 2026?

Local Connection Criteria (Paragraph 11.2 of the <u>June 2025 Housing Allocations Policy</u>)	Number of Households on the Housing Register
a. Resides in the District as their only or principal home and has done so continuously for the previous 2 years.	
b. Is in paid employment in the District (16hrs or more per week) and has been continuously for the previous 2 years.	
c. Has close relatives who reside in the District as their only principal home and have done for at least the previous 5 years (or the previous 2 years if the Applicant is aged 65 or over) where the Council considered that it is necessary for the Applicant to be accommodated within the District in order to provide or receive significant and essential medical or social support to/from the relative.	
d. Is a care leaver who is owed a continuing duty under s.23C of the Children Act 1989 by West Sussex County Council; or is owed that duty by another Authority but has resided in Mid Sussex for at least two years; some or all of which falls before they turn 16.	
Total Households	

4. The total number of households on the Council's Housing Register on 31 March 2026 or date most recently recorded (please confirm the time period used) specifying the following locations as their preferred choice of location:

Location	Household Preferences (31 March 2026)
Haywards Heath Civil Parish	

5. The number of properties advertised, and the average number of bids per property over the 2025/26 monitoring period for the following types of affordable property in the locations listed below:

Type of affordable property	Haywards Heath Civil Parish	
	Number of properties advertised	Average Bids per Property
1-bed affordable dwelling		
2-bed affordable dwelling		
3-bed affordable dwelling		
4+ bed affordable dwelling		

-
-

Social Housing Stock

6. The total number of social housing dwelling stock on 31 March 2025 in the following locations:

Location	Total Social Housing Stock (31 March 2025)
Haywards Heath Civil Parish	

Social Housing Lettings

7. The number of social housing lettings in the period between 1 April 2025 and 31 March 2026 in the following locations:

-

Location	Social Housing Lettings
	1 April 2025 to 31 March 2026
Haywards Heath Civil Parish	

-

Temporary Accommodation

8. The number of households on the Housing Register housed in temporary accommodation within and outside the Mid Sussex area on the following dates:

Households in Temporary Accommodation	31 March 2026
---------------------------------------	---------------

Households Housed within Mid Sussex	
Households Housed outside Mid Sussex	
Total Households	

Housing Completions

9. The number of **NET** housing completions in the Mid Sussex area broken down on a per annum basis for the period between 2000/01 and 2025/26.
10. The number of **NET** affordable housing completions in the Mid Sussex area broken down on a per annum basis for the period between 2000/01 and 2025/26.
11. The number of **NET** housing completions in Haywards Heath Civil Parish broken down on a per annum basis for the period between 2000/01 and 2025/26.
12. The number of **NET** affordable housing completions in Haywards Heath Civil Parish broken down on a per annum basis for the period between 2000/01 and 2025/26.

Glossary of Terms

Housing Register	The housing register is a waiting list of households in a given authority area who are eligible and in need of an affordable home.
Local Connection Criteria	The conditions used by a local authority to decide whether a person has a sufficient connection to the area to qualify for joining its housing register. A local connection is usually based on factors such as living in the area for a set period, working locally, having close family nearby, or needing to move to provide or receive support. In Mid Sussex, the Local Connection Criteria are set out in section 11.2 of the Mid Sussex District Council's Housing Allocation scheme (June 2025): https://www.midsussex.gov.uk/media/ecegvd2d/housing-allocation-scheme-june-2025.pdf
Affordable Property	Housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions: a. Social rent; b. Other affordable housing for rent; c. Discounted market sales housing; and

[1]

	d. Other affordable routes to home ownership.
Housing Completion	A dwelling is counted as completed when construction has ceased, and it becomes ready for occupation. This includes new build dwellings, conversions, changes of use and redevelopments. Housing completions should be provided as net figures.
Net	Net refers to total (gross) figures minus any deductions (for example, through demolitions).
Monitoring Period	From 1 April in any given calendar year through until 31 March in the following calendar year.
Prevention Duty	The prevention duty applies when a local authority is satisfied that an applicant is threatened with homelessness and eligible for assistance.
Relief Duty	The relief duty applies when a local authority is satisfied that an applicant is homeless and eligible for assistance.
Parish	The smallest unit of local government.
Ward	A division of a city or town, for representative, electoral, or administrative purposes.

I look forward to hearing from you. If there are any issues with providing any of the data then please get in touch.

Confirmation of receipt would be greatly appreciated.

Kind regards,

Lisa Luong BSc (Hons) MSc MRTPI

Senior Planner

Tetlow King Planning



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[1] As defined by Annex 2 of the National Planning Policy Framework (2024) which can be viewed [here](#).

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Appendix JS3

Relevant Extracts from Planning Practice Guidance



Extracts from Planning Practice Guidance

Appendix JS3

Section	Paragraph	Commentary
Housing and Economic Needs Assessment	006 Reference ID: 2a-006-20241212	This section sets out that assessments of housing need should include considerations 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 to 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 objective 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-018-20190220	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> .
Housing and Economic Needs Assessment	019 Reference ID 2a-019-20190220	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 Assessment	020 Reference ID 2a-020-20190220	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-024-20190220	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>
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 requirements for the next 5 year period (the Sedgefield approach)..."</i>
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>

Appendix 4

‘English Council’s Spend £1.7bn on Housing Homeless People’, BBC, 13 October 2023



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English councils spend £1.7bn on housing homeless people

🕒 13 October 2023



GETTY IMAGES

| Charity Shelter said the government was throwing money at "grim B&Bs" instead of homing families

Tim Dodd and PA

Page 1 of 9

English councils spent more than £1.7bn on temporary accommodation for homeless people in the past year, new data shows.

A total of £1.74bn was spent on private accommodation, hostels, refuges, and B&Bs between April 2022 and March 2023.

Housing charity Shelter accused the government of throwing money at "grim B&Bs" instead of homing families.

The government said councils had a duty to ensure no family was "left without a roof over its head".

The figure, published by the Department for Levelling Up, Housing and Communities, is up by about 9% on the previous year, but is a gross figure that does not take into account sales and fees paid to local authorities, along with other council income.

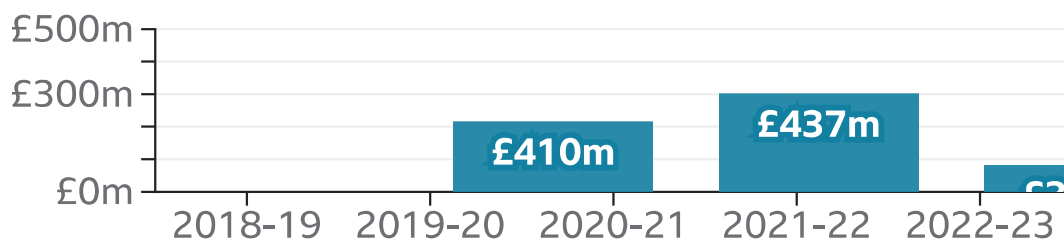
Councils charge fees for rent and energy in their emergency housing, and sometimes they sell their property assets.

When these are accounted for, the cost of temporary accommodation to March was £657m, up from £585m the year before.

B&B accommodation alone accounted for almost £500m in gross costs, up by a third on the previous year of £369m.

B&Bs for homeless people cost councils almost £500m last year

Spending on bed and breakfasts as temporary accommodation by local authorities in England



Source: Department for Levelling Up, Housing and Communities •
 2022-23 figures are provisional
 Figures not adjusted for inflation

Shelter's chief executive Polly Neate said the amount spent on temporary accommodation was not only "outrageous, but it's also illogical".

"We simply can't keep throwing money at grim B&Bs and hostels instead of focusing on helping families into a home," she said.

"Housing benefit should cover the bottom third of local rents but the government has kept it frozen since 2020 while private rents have skyrocketed.

"This decision combined with the decades of failure to build enough social homes has meant that families can't find anywhere affordable to live and as a result are forced into homelessness in cramped and unsuitable temporary accommodation, often miles away from their children's schools and support networks."



Some 104,510 households were in temporary accommodation by the end of March - a 25-year high

Government **statistics released in July** showed the numbers of households and children in temporary accommodation in England were at record highs.

The number of children in that situation is at the highest level since records for that measure began in 2004 - with 131,370 children living in temporary accommodation, as of the end of March.

Riverside, a developer of affordable housing which also provides homelessness services and supported housing, said the rise on B&B spending was "sadly not

at all unexpected".

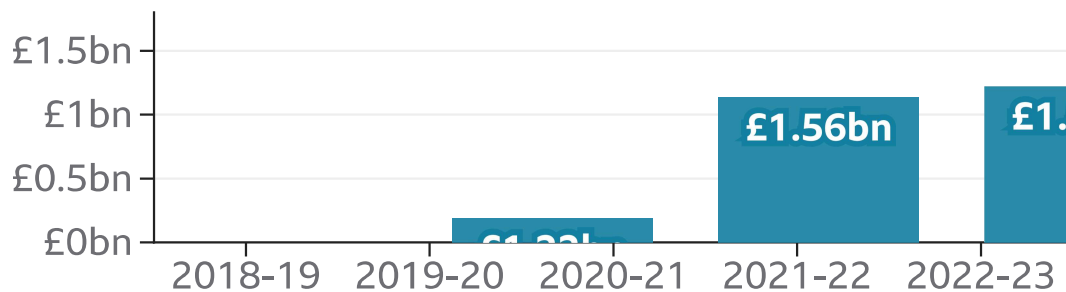
John Glenton, its executive director, said the number of people living in temporary accommodation or facing homelessness was "becoming a growing humanitarian crisis in England, particularly for families living together in single-room B&Bs".

Local Government Association housing spokesman Darren Rodwell called for local housing allowance rates to be "urgently reviewed" to make the market more affordable.

He added the government should develop a cross-departmental homelessness prevention strategy, and to give councils powers to build more social homes.

Temporary housing costs rise each year

Spending on temporary accommodation by local authorities in England



Source: [Department for Levelling Up, Housing and Communities](#) •
2022-23 figures are provisional
Figures not adjusted for inflation

B B C

A government spokesperson said: "We are determined to prevent homelessness before it occurs and have given £2bn over three years to help local authorities tackle homelessness and rough sleeping, targeted to areas where it is needed most.

"Councils have a duty to ensure no family is left without a roof over its head and government funding can be used to help people find a new home, work with landlords to prevent evictions, or to pay for temporary accommodation.

"We are already investing in more social and affordable housing and, since 2010, have delivered over 659,500 new affordable homes, including over 166,300 homes for social rent."

Appendix 5

Shelter Press Release 'Bill for Homeless Accommodation soars by 25%, hitting £2.8bn, 18 September 2025

Bill for homeless accommodation soars by 25%, hitting £2.8 bn

Posted 18 Sep 2025

Bill for homeless accommodation soars by 25%, hitting £2.8 bn

Today the government has released new figures revealing local councils spent a total of £2.8 billion on temporary accommodation for 2024/25 to accommodate households who are homeless. This is a 25% increase in one year.

The figures for April 2024 to March 2025 reveal that in England:

The total amount councils spent on temporary accommodation has more than doubled (118% increase) in the last five years.

One third of the total – £844 million – was spent on emergency B&Bs and hostels, which is the worst type of temporary accommodation for families, as they have to share kitchens and bathrooms with strangers.

40% of total – over £1 billion – was spent on nightly paid, self-contained accommodation. This is a 79% increase, the biggest increase in spending in one year. This privately managed accommodation is often the most expensive, where some families are living in a room that can be just as cramped as B&Bs.

Instead of paying billions for temporary solutions, the government should focus on ending the housing emergency for good by delivering a new generation of social rent homes. Shelter is urging the government to build on the new Social and Affordable Homes Programme and set an overall national target to deliver social rent homes to ramp up to 90,000 a year for ten years.

Mairi MacRae, Director of Campaigns and Policy at Shelter, said: “While the housing emergency is draining billions in public funds, families across the country are paying the ultimate price. Money that should be helping them into a secure home is instead shelled out on grim temporary accommodation, just to keep people off the streets.

"There's nowhere near enough social homes and as a result homelessness has reached record levels, with thousands of desperate families showing up to their council's doorstep for help. Private providers are cashing in on this crisis, charging eyewatering sums for rooms where children are forced to eat, sleep and do their homework on beds shared with siblings.

"We can't afford to ignore the need for genuinely affordable social homes – the only solution to the housing emergency. The government needs to ramp up to 90,000 a year by setting a clear overall target for the delivery of social rent homes."

Anyone who is facing homelessness can get free and expert advice from Shelter by visiting www.shelter.org.uk/get_help.

ENDS

Notes to editors:

Notes to the editor:

The total amount spent on temporary accommodation (TA) by councils in England in 2024/25 is published by the Ministry for Housing, Communities and Local Government (MHCLG), Revenue outturn housing services, LA drop-down. The data is available [here](#).

Councils spent £2.842091 billion on providing temporary accommodation for homeless households between April 2024 and March 2025. This figure includes the cost to local authorities of administering temporary accommodation, (£173.682 million across England).

We have compared 2024/25 data with 2023/24 and 2019/20 data to show the change over the last year and the last five years. The 2019/20 data is published [here](#): Revenue outturn housing services (R04) and the 2023/24 data is published [here](#): Revenue outturn housing services (R04). The amount spent on administering temporary accommodation was not available as a standalone figure pre 2020/21. Therefore when comparing the figure over five years we have compared the amount spent just on accommodation excluding administration (£2.668409 billion in 2024/25 and £1.224531 billion in 2019/20).

The amount spent on hostels and B&Bs in 2024/25 was £844.236 million, or 32% of the total (excluding administration). As well as being expensive, B&Bs and hostels are regarded as one of the least suitable types of accommodation for families to live in.

This is because they often involve having to share facilities (bathrooms and kitchens)

and often the whole family will also have to sleep in one room. There is a six-week legal limit on families being placed in B&Bs.

The amount spent on nightly paid, privately managed self-contained accommodation in 2024/25 was £1.078283 billion. This has increased by 79% in the last year and makes up 40% of the total (excluding administration). This self-contained accommodation can be families sharing one or two rooms with their own facilities (bathrooms and kitchens).

£2.842091 is the total expenditure (total amount) spent on temporary accommodation (column E). The total amount spent on TA includes Department for Work and Pensions (DWP) funding through housing benefit and the housing element of Universal Credit (TA subsidy). The DWP sends their percentage of funding to councils to pay for costs, and councils make up the remaining from their own budgets. In addition, many households have to contribute towards their housing costs from their own incomes. This is in part because the TA subsidy has been frozen at 2011 levels.

MHCLG also publishes the net current expenditure (column I). This is the amount of money that councils have to spend on temporary accommodation from their own budgets. This excludes the funding that councils receive from DWP through housing benefit and the money that TA residents have to pay from their own incomes. In 2024/25 this figure was £1.437397 billion.

About Shelter: Shelter exists to defend the right to a safe home and fight the devastating impact the housing emergency has on people and society. Shelter believes that home is everything. Learn more at www.shelter.org.uk



Appendix 6

Affordable Housing as a Separate Material Consideration



Affordable Housing as a Separate Material Consideration

Appendix JS6

- 1.1 Regarding the weight to be attached to the proposed affordable housing benefits at the appeal site, as set out in the Affordable Housing Proof of Evidence, the need is acute, the benefits are considerable, and the weight in the planning balance should be **very substantial** (for the purposes of this appeal it has been agreed in the SoCG that in terms of the scale for the descriptors of weight, the top end of the scale will be very significant). Affordable housing is a material benefit and should therefore be awarded its own weight in the planning balance.
- 1.2 Many appeal decisions issued by Inspectors and the Secretary of State (“SoS”) have recognised affordable housing as an individual benefit and have specifically awarded affordable housing provision its own weight in the planning balance. Some examples are summarised below.

Appeal Ref.	Site Name	Decision Type	Decision	Date	Para Ref.	Weight to Affordable Housing	Paragraph Text
APP/R3650/W/23/3332590	Land at Coombebury Cottage, Dunsfold Common Road, Dunsfold	Inspector	Allowed	08-May-24	48	Significant	<i>"I note that the Inspector in the 'Knowle Lane appeal' appears to have combined the benefits of market and affordable housing delivery when making his decision. Nonetheless, based on the evidence before me, the benefit of providing affordable homes is clearly different from that of providing market housing as they each respond to related yet discrete needs. Accordingly, the proposed provision of affordable housing also carries its own significant weight in favour of the appeal development."</i>
APP/F2360/W/22/3295498 and APP/F2360/W/22/3295502	Pickering's Farm Site, Flag Lane, Penwortham, Lancashire	SoS	Allowed	20-Nov-23	25	Significant	<i>"For the reasons given at IR343 the Secretary of State agrees that the delivery of a total of some 1,100 homes in a mix of sizes is a significant benefit, to which he gives significant weight. He further agrees that the delivery of affordable housing would be a benefit carrying significant weight."</i>
APP/C2741/W/21/3282598	Land to the East of New Lane, Huntington, York	SoS	Allowed	17-Oct-23	44	Very significant	<i>"He further agrees that the provision of 30% affordable housing, of a tenure and size to be agreed, would also be a very significant benefit of the scheme (IR380)."</i>
APP/Q3115/W/22/3296251	Land off Papist Way, Cholsey, Oxfordshire	SoS	Dismissed	10-Oct-23	26	Significant	<i>"For the reasons given at IR359 and IR390, the Secretary of State agrees that the benefits of affordable housing which the proposal would provide would comply with SOLP policy H9 and should be afforded significant weight."</i>

APP/C1570/W/21/3289755	Land East of Highwood Quarry, Park Road, Little Easton, Dunmow	SoS	Allowed	11-Sep-23	34	Great	<i>"For the reasons given at IR535 he agrees that <u>the delivery of affordable housing is a benefit of great weight.</u>"</i>
APP/L5240/W/22/3296317	103-111a High Street, Croydon	SoS	Dismissed	06-Apr-23	25	Significant	<i>"For the reasons given at IR153 and IR168, the Secretary of State agrees with the Inspector that affordable housing delivery is a priority, and like the Inspector, <u>he affords the provision of affordable dwellings significant beneficial weight (IR153).</u>"</i>
APP/C2741/W/21/3282969	Site to the West of The A1237 and South of North Lane, Huntington, York	SoS	Allowed	14-Dec-22	27	Significant	<i>"For the reasons given at IR178 and IR196, <u>the Secretary of State agrees that delivery of 30% affordable housing would be a further social and economic benefit to which significant weight should be attached.</u>"</i>
APP/M0655/W/17/3178530	Land at Peel Hall, Warrington	SoS	Allowed	09-Nov-21	24	Very substantial	<i>" He further agrees (IR524) that <u>the provision of affordable housing attracts very substantial weight,</u> for the reasons given."</i>
APP/A2280/W/20/3259868	Land off Pump Lane, Rainham, Kent	SoS	Dismissed	03-Nov-21	33	Substantial	<i>"...The Secretary of State considers that the weight to be afforded to the delivery of housing in the light of the housing land supply shortfall is substantial (all IR12.201). Similarly, the Secretary of State agrees at IR12.202 that for the reasons given there is an acute need for affordable housing and in light of that, <u>the delivery of at least 25% of the residential units as affordable accommodation attracts substantial weight.</u>"</i>
APP/W1850/W/20/3244410	Land North of Viaduct adj. Orchard Business Park, Ledbury	SoS	Allowed	15-Mar-21	27	Substantial	<i>"For the reasons given in IR16.122-16.123, the Secretary of State also gives <u>substantial weight to the delivery of affordable housing.</u>"</i>
APP/Y0435/W/17/3169314	Newport Road and Cranfield Road	SoS	Dismissed	25-Jun-20	32	Significant	<i>"Weighing in favour of the proposal, <u>the Secretary of State affords the provision of affordable housing significant weight</u> and also affords the provision of market housing significant weight."</i>
APP/E5330/W/19/3233519	Land at Love Lane, Woolwich	SoS	Dismissed	03-Jun-20	28	Substantial	<i>"The Secretary of State considers that, in terms of benefits, <u>the provision of housing benefits and affordable housing benefits each carry substantial weight.</u>"</i>
APP/Q3115/W/19/3230827	Oxford Brooks University, Wheatley Campus	SoS	Allowed	23-Apr-20	35	Very substantial	<i>35 "...Given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, he agrees with the Inspector at IR13.111, <u>that the delivery of up to 500 houses, 173 of which would be affordable, are considerations that carry very substantial weight.</u>"</i> <i>IR 13.111 "<u>The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as "acute" by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight irrespective of the fact that the Council can demonstrate a 3/5YHLS.</u>"</i>

APP/G1630/W/18/3210903	Land at Fiddington, Ashchurch near Tewkesbury	SoS	Allowed	22-Jan-20	20	Substantial	<i>"...The Secretary of State agrees with the Inspector, and further considers that the provision of affordable housing in an area with a serious shortfall would be of significant benefit and attracts substantial weight in favour of the proposal."</i>
APP/A0665/W/14/2212671	Darnhall School Lane	SoS	Dismissed	04-Nov-19	28	Substantial	<i>"The Secretary of State agrees that the social benefits of the provision of affordable housing should be given substantial weight, for the reasons set out at IR408-411."</i>
APP/P4605/W/18/3192918	Former North Worcestershire Golf Club, Hanging Land, Birmingham	SoS	Allowed	24-Jul-19	33	Significant	<i>30 "Weighing in favour the Secretary of State considers that the 800 family homes, including up to 280 affordable homes is a benefit of significant weight."</i>
APP/E2001/W/18/3207411	Hutton Cranswick	Inspector	Dismissed	05-Jun-19	39	Significant	<i>"However, aside from the provision of affordable housing (to which I attach significant weight), the provisions are essentially intended to mitigate the effect of the development-although they could be of some benefit to the wider public, and I have therefore given them very limited weight."</i>
APP/P0119/W/17/3191477	Coalpit Heath, South Gloucestershire	Inspector	Allowed	06-Sep-18	61	Substantial	<i>"There are three different components of the housing that would be delivered: market housing, affordable housing (AH) and custom-build housing(CBH). They are all important and substantial weight should be attached to each component for the reasons raised in evidence by the appellants, which was not substantively challenged by the Council, albeit they all form part of the overall housing requirement and supply. The fact that the much needed AH and CBH are elements that are no more than that required by policy is irrelevant –they would still comprise significant social benefits that merit substantial weight."</i>
APP/L3815/W/16/3165228	Land at the Corner of Oving Road and A27, Chichester	Inspector	Allowed	18-Aug-17	63	Substantial	<i>"Moreover, the provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently I attach substantial weight to this element of the proposal."</i>
APP/P1425/W/15/3119171	Mitchelswood Farm, Newick, Lewes	SoS	Allowed	23-Nov-16	18	Significant	<i>"For the reasons given at IR196-201 the Secretary of State agrees that the provision of 20 affordable homes is a tangible benefit of significant weight."</i>
APP/G1630/W/14/3001706	Cornerways, High Street, Twynning	Inspector	Allowed	13-Jul-15	63	Very substantial	<i>"...Table 7.16 of the Strategic Housing Market Assessment [SHMA] Update [CDA17] identifies that the net annual need for affordable housing in Tewkesbury is 587 dwellings. This is more than twice the equivalent figure for the neighbouring District of Wychavon, despite the fact that Tewkesbury's population is little more than two thirds of that in Wychavon. The Inspector in the Wychavon appeal found that the provision of affordable housing in that case: "...is a clear material consideration of significant weight that mitigates in favour of the site being granted planning permission"; the Secretary of State agreed. Given the much larger quantum of identified need in Tewkesbury and the magnitude of the accumulated shortfall in affordable housing delivery, it would be appropriate to attribute very substantial weight to this important benefit of the proposal."</i>

APP/E2001/A/ 13/2200981 and APP/E2001/A/ 14/221394	Brickyard Lane, Melton Park, East Riding	SoS	Dismissed	25-Jun-15	11	Substantial	<i>"However, he also agrees with the Inspector's conclusion that <u>substantial weight should attach to the proposals in proportion to the contribution they would make to the supply of affordable housing.</u>"</i>
APP/K2420/A/ 13/2208318	Land surrounding Sketchley House, Watling Street, Burbage, Leicestershire	SoS	Allowed	18-Nov-14	13 / IR 6.19	Substantial	13. "For the reasons given at IR11.20-IR11.23, the Secretary of State agrees with the Inspector's findings in relation to affordable housing, and with his conclusion at IR11.23 that the need for affordable housing is acute and warrants the provision offered by the appeal proposal." IR 6.19 "In those circumstances, there is no reason to depart from the statutory basis to providing for affordable housing set out in policy 15 of the Core Strategy. The policy takes account of the needs identified in the SHMA (2008) and was found to be sound by the Core Strategy Inspector. Hence, although <u>substantial weight should be given to the affordable housing</u> offered, that weight should not be overwhelming."
APP/H1840/A/ 13/2199085 and APP/H1840/A/ 13/2199426	Pulley Lane, Droitwich Spa	SoS	Allowed	02-Jul-14	23 / IR 8.126	Very significant	23. "For the reasons given at IR8.112-8.126, the Secretary of State agrees with the Inspector's conclusion at IR8.127 that the Council does not have a 5-year supply of housing land and the appeal scheme is necessary to meet the housing needs of the district, including the need for affordable housing." IR 8.126 "It seems to me that the Council has largely ignored the affordable housing need in its evidence. The poor delivery record of the Council has also been largely overlooked. The Council's planning balance is struck without any apparent consideration being given to one of the most important reasons why housing in Droitwich Spa is needed. <u>From all evidence that is before me the provision of affordable housing must attract very significant weight in any proper exercise of the planning balance.</u>[4.47]"

Appendix 7

Summaries of Relevant Appeal Decisions



Relevant Secretary of State and Appeal Decisions

Appendix JS7

- 1.1 Brief summaries of appeal decisions relevant to the appeal are summarised below. The full decisions are included as Core Documents.

Appeal Decision 3136237 and 336233: Land to the west of Langton Road, Norton (July 2016) – (CD12.6)

- 1.2 The combined appeals were for a total of 93 dwellings, including affordable housing. This decision demonstrates that the purpose of affordable housing planning policy is to derive a benefit.
- 1.3 In determining the combined appeals the Inspector considered the role of affordable housing as a benefit, noting at paragraph 72:

“72. On the other hand, in the light of the Council’s track record, the proposals’ full compliance with policy on the supply of affordable housing would be beneficial. Some might say that if all it is doing is complying with policy, it should not be counted as a benefit but the policy is designed to produce a benefit, not ward off a harm and so, in my view, compliance with policy is beneficial and full compliance as here, when others have only achieved partial compliance, would be a considerable benefit (emphasis mine).”

Appeal Decision 3191477: Land east of Park Lane, Coalpit Heath, South Gloucestershire (September 2018) (CD12.16)

- 1.4 This appeal was for 71 dwellings, including 28 affordable homes and shows that separate weight should be attributed to the different components of housing, in that instance market, affordable and custom-build housing. It also highlights that the benefits of affordable housing should not be dismissed if provision is just policy compliant.

1.5 The Inspector explained this at paragraph 61:

“61. There are three different components of housing that would be delivered: market housing, affordable housing (AH) and custom-build housing (CBH). They are all important and substantial weight should be attached to each component for the reasons raised in evidence by the Appellants, which was not substantially challenged, by the Council, albeit they all form part of the overall housing requirement and supply. The fact that the much needed AH and CBH are elements that are no more than that required by policy is irrelevant – they would still comprise significant social benefits that merit substantial weight”.

Appeal Decision 3297487: Land at Witney Road, Ducklington (January 2023) – (CD12.17)

1.6 At this appeal in Oxfordshire delivering 40% policy-compliant affordable housing (up to 48 affordable homes), the Inspector considered the role of open market-led housing development in delivering affordable homes in West Oxfordshire. It also highlights the significance of shortfalls in the delivery of affordable housing and challenging affordability indicators including Housing Register numbers and long waiting times for an affordable home. It is also important in demonstrating that these are real world impacts affecting people’s everyday lives.

1.7 At paragraph 102 at page 14 of the decision, the Inspector noted that:

“102. The Council acknowledged that it relies upon the delivery of market housing to provide affordable homes. Such delivery is being impaired by the inadequate housing land supply provision and as I found earlier is unlikely to be remedied in the near future”.

1.8 The Inspector went on to consider evidence of past shortfalls of affordable housing delivery, alongside affordability indicators including long waits for allocation and lengthy Housing Register figures. Paragraph 103 at page 14 states that:

*“103. When assessed against the 2014 SHMA target there is 6 years of under delivery and 2 years of surplus but an overall significant shortfall. According to the Council’s own most recent figures, **there are 2,985 applicants on the Council’s housing register. Waiting times are between 721 days and 1,027 days according to the size of the dwelling. I find the affordable housing shortfall is substantial** (emphasis mine)”.*

- 1.9 At paragraph 103, the Inspector noted the real-world impact of these affordability problems, explaining that:

“103. These figures represent people lacking suitable housing everyday of their lives, resulting in impaired quality of life and challenges for health and wellbeing.”

- 1.10 At paragraph 105, the Inspector reaches a conclusion on weight and in doing so, supported the evidence of the Appellant, setting out that *“I therefore conclude that the **proposal should be afforded the substantial weight suggested by the appellant** (my emphasis).”*

Appeal Decision 3324631: Land at Sondes Place Farm, Westcott Road, Dorking (December 2023) – (CD12.1)

- 8.1 This appeal (where Tetlow King Planning gave affordable housing evidence) was for 144 dwellings (72 of which to be affordable). It considers the critical importance of understanding the ability of Councils to meet future affordable housing needs and endorses the use of the Sedgefield approach to clearing previous backlog when projecting future affordable housing supply. The decision also highlights the consequences of not providing sufficient affordable housing.
- 8.2 In terms of projecting forward the likely future supply of affordable housing, the Inspector stated at paragraphs 85-86:

“85. Compared to the Core Strategy Policy CS4 target a shortfall of 234 affordable homes has arisen across the current development plan period. The most recent evidence of need points to an increased need for affordable homes (143 dpa). However, in the last three years alone, there has been a shortfall of 396 affordable homes due to the delivery of only 33 dpa in those years.

86. To clear the backlog 222 affordable homes would need to be delivered each year for the next five years. The number of affordable homes coming forward looks to be substantially below that level of delivery. This will mean the existing shortfall will only become worse.” (my emphasis).

- 8.3 The Inspector went on to outline the consequences of not providing sufficient affordable housing (paragraphs 88-89):

“88. 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. In Mole Valley the number of people on the housing register has risen, there are increasing affordability ratios and people are paying significantly over 30% of their income on rent.

89. *The proposal would deliver up to 72 affordable homes with a suitable tenure split, which exceeds the 40% on site provision that Core Strategy Policy CS 4 requires. The s106 agreement secures the provision and tenure split. **The affordable homes would make a sizeable contribution to addressing the acute and long-established shortfall which will not be fully addressed in the short term. I give the affordable housing provision very substantial positive weight.*** (my emphasis).

Appeal Decision 3329947: Land lying to the east of Hartfield Avenue and fronting on to Barnet Lane, Elstree, Hertfordshire (March 2024) – (CD12.18)

- 1.11 The Inspector considers the weight to be afforded to affordable housing in the context of limited prospects of meeting the identified need (paragraphs 130 to 133). It highlights the importance of both past and future affordable housing delivery.

“Affordable housing

130. *The proposal would deliver 45% affordable housing, compared to the policy requirement of at least 35%, amounting to up to 33 dwellings. The difference between the parties is again one of weight, with the Council favouring substantial weight and the Appellant claiming very substantial weight.*

131. *The Council suggests that the weight increases with the number provided and not the overall percentage. However, the two are inextricably linked as a greater percentage inevitably increases the actual quantum. Again, comparison is made with Little Bushey Lane, where up to 124 affordable homes (40%) were given very substantial weight, and it is said it would be rational to acknowledge the difference in scale by apportioning lesser weight.*

132. ***However, since that date, net delivery has decreased, and the shortfall has increased. It is telling that as little as 14% of total housing completions have been affordable and future prospects offer no solace to a mounting problem.***

133. *On this basis and taking account of the totality of Appellant’s undisputed evidence, the anticipation of up to 33 affordable units being delivered within the five-year period also merits **very substantial weight** (emphasis mine)."*

Appeal Decision 3282908: Land to the east of Highgate Hill and south of Copthall Avenue, Hawkhurst, Kent (March 2022) (CD12.8)

- 1.12 This appeal decision considers the issue of benefits on a scheme for 71 dwellings, including affordable provision at 40%. Of relevance is in critiquing the Council’s views regarding the affordable housing benefits of the scheme, the Inspector made the following comments (paragraph 118):

“118. The Council are of the view that the housing benefits of the scheme are ‘generic’ and would apply to all similar schemes. However, in my view, this underplays the clear need in the NPPF to meet housing needs and the Council’s acceptance that greenfield sites in the AONB are likely to be needed to meet such needs. Further, I agree with the appellant that a lack of affordable housing impacts the most vulnerable people in the Borough, who are unlikely to describe their needs as generic”.

Appeal Decision 3303868: Land between Lodge Lane and Burtons Lane, Little Chalfont, Amersham (March 2023) – (CD12.19)

- 1.13 This appeal was for the delivery of 367 dwellings (152 of which to be affordable) and was refused by Buckinghamshire Council. The decision demonstrates the benefits to policy compliant provision of affordable housing and also highlights the importance of affordability challenges, including affordability ratios.
- 1.14 The Inspector highlights the importance placed on the delivery of affordable housing, stating at paragraph 129, *“both the main parties afford the proposed provision of 215 units of market housing and 152 affordable housing, very substantial weight”*. The Inspector also indicates that the provision of affordable housing as part of the development proposals is a substantial benefit (paragraph 159).
- 1.15 This is in light of the historical undersupply of affordable housing, which the Inspector refers to in paragraphs 132 and 133. Alongside referring to the median and lower quartile levels of affordability and noting that for the last 15 years these have been considerably higher in Buckinghamshire than the wider south-east (paragraph 131).

1.16 The Inspector concludes at paragraph 134:

“134. The appeal scheme is policy compliant in terms of affordable housing provision and would make a significant contribution to addressing both market and affordable housing need” (my emphasis).

1.17 **Appeal Decision 3349986: Brookfield Nursery, Ruishton Lane, Ruishton, Somerset (February 2025) (CD12.15)**

1.18 This appeal was against the Council’s refusal to grant outline planning permission for up to 150 dwellings (up to 38 affordable homes). Of relevance is the conclusion reached by the Inspector presiding over that appeal that the reduction in expenditure on bed and breakfast accommodation for those in temporary accommodation is a significant benefit of that appeal scheme.

1.19 Paragraph 64 of the decision states the following:

*“64. Out-of-date settlement boundaries aside, the development would be consistent with the Council’s overall spatial strategy to focus development in the most accessible and sustainable locations. **Other significant benefits include...***

Savings to a Council that has declared an economic emergency through a reduction on B&B expenditure for those in temporary accommodation” (My emphasis).

1.20 The Inspector went on to state in paragraph 65 that:

“65. irrespective of the competing submissions on housing land supply, the largely undisputed social, economic and environmental benefits listed about are of such magnitude that they clearly outweigh the identified harms and associated policy conflicts”.

Appeal Decision 3230827: Oxford Brookes University, Wheatley Campus, College Close, Wheatley, Oxford (April 2020) (CD12.4)

1.21 This appeal decision sets out the importance of meeting housing need of real households in urgent needs and the weight that attaches to the provision of affordable housing.

- 1.22 Inspector DM Young asserted at paragraph 13.101 of their report that in the context of a lengthy housing register of 2,421 households:

“13.101 It is sometimes easy to reduce arguments of housing need to a mathematical exercise, but each one of those households represents a real person or family in urgent need who have been let down by a persistent failure to deliver enough affordable houses” (my emphasis).

- 1.23 The Inspector went on to state at paragraph 13.102 that:

“13.102 Although affordable housing need is not unique to this district, that argument is of little comfort to those on the waiting list” before concluding that “Given the importance attached to housing delivery that meets the needs of groups with specific housing requirements and economic growth in paragraphs 59 and 80 of the Framework, these benefits are considerations of substantial weight”.

- 1.24 In undertaking the planning balance, the Inspector stated at paragraph 13.111 of their report that:

“13.111 The Framework attaches great importance to housing delivery that meets the needs of groups with specific housing requirements. In that context and given the seriousness of the affordable housing shortage in South Oxfordshire, described as “acute” by the Council, the delivery of up to 500 houses, 173 of which would be affordable, has to be afforded very substantial weight”.

- 1.25 In determining the appeal, the Secretary of State concurred with these findings, thus underlining the importance of addressing needs on the Housing Register, in the face of acute needs and persistent under delivery.