



# Hearing Statement – Matter 6: Housing

**Mid Sussex District Council – Examination in Public**

**Prepared on behalf of Miller Homes Ltd**

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## 1.0 Introduction

- 1.1 This statement has been prepared by SLR Consulting Ltd on behalf of Miller Homes Ltd in respect of the Mid Sussex District Plan (2021 – 2039) Examination in Public. The Statement focuses on questions raised by the Inspector in their MIQs in relation to Matter 6: Housing.
- 1.2 By way of background, Miller Homes has an interest in land at Colwell Farm ('the site'), which is located on the eastern edge of Haywards Heath and has capacity to deliver up to 80 new homes on the edge of one of the district's most sustainable settlements. The location of the site is shown in Appendix 1.



## 2.0 Housing

- 2.1 Matter 6 of the Inspector’s MIQs seeks to explore whether the Council’s approach to calculating its full, objectively assessed needs and housing requirement is justified, based on up-to-date and reliable evidence, effective, positively prepared, and consistent with national policy?
- 2.2 This statement focuses on matters relevant to the following topic areas:
- Objectively Assessed Needs
  - Housing Requirement

### Objectively Assessed Needs

**Q57. Does the Plan period cover an appropriate time frame for the provision of housing (2021-2039) consistent with national policy? If not, what would be the implications for housing need?**

- 2.3 The NPPF requires strategic policies to look ahead over a minimum 15-year period from adoption (paragraph 22) and it is noted that the plan period is an 18-year period starting in 2021 to take account of existing commitments (allocations / permissions), and completions between 2021 and 2023. The Council’s most recent Local Development Scheme (January 2024) expects the plan to be adopted by December 2024 but given that Stage 1 matters are due to be heard at EiP in late October 2024, and a timetable for Stage 2 matters has not been published yet, it is unrealistic to assume that the plan will be adopted by the end of 2024.
- 2.4 In the best-case scenario of adoption in early/mid 2025, the strategic housing policy DPH1 would be looking ahead to less than the minimum 15-year period (2025 – 2039) which fails to meet the minimum requirements of the Framework.
- 2.5 Accordingly, it is considered that the plan period should be extended by at least a further year (to 2040), which would therefore require additional sites to be allocated to address the additional requirement of 1,090 homes that an extra year in the plan period would result in.



**Q58. To determine the minimum number of homes required, housing policies should be informed by the Government’s local housing need methodology. As such, are the inputs used to determine the level of housing needed within the Plan appropriate?**

**Q59. Are there exceptional circumstances to suggest that an alternative approach be taken? If so, what are they, and how would they impact on housing need? Is the Strategic Housing Market Assessment 2021 (H1) up to date and justified?**

- 2.6 The provision of local housing needs as set out in the Submission Plan is calculated using the Government’s standard method, and as a starting point this position is agreed. The standard method is to be treated as a minimum as per paragraphs 11b, 35a and 61 of the Framework.
- 2.7 Whilst an affordability adjustment is accounted for in the standard method, given the severe affordability pressures in large parts of the South-East including Mid Sussex where median house prices are 12.09 times higher<sup>1</sup> than median incomes; an additional location-specific uplift to the housing target should be applied to account for these affordability challenges. This is in line with guidance from the PPG which seeks for adjustments to be made to ensure minimum housing needs can start to address affordability issues.
- 2.8 Proposed strategic policy DPH1 shows a figure of 996 dwellings ‘for resilience’ and ‘unmet need’. This number equates to 5% of the total housing requirement which in our view is extremely low especially in context of building in resilience against the inevitable slow delivery of large-scale strategic sites the Plan is reliant on (some 4,700 unit (62%) of planned housing provision).
- 2.9 To properly plan for resilience, it is submitted that a buffer of at least 10% is needed in the case of Mid Sussex, with additional allocations required to provide for this buffer. The absence of an appropriate buffer would result in a plan that is not positively prepared or effective (contrary to paragraph 35 of the NPPF).
- 2.10 Confusingly, the ‘over supply’ of 996 dwellings across the plan period is said in the Submission Plan to be a buffer against non-implementation but also to serve as a

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<sup>1</sup> as identified in the MSDC Housing Needs and Requirement Topic Paper, July 2024



contribution to unmet needs in the Northern West Sussex HMA. This low figure of 996 dwellings cannot act as both a buffer and a contribution towards unmet needs, and as such a specific figure should be specified as the contribution towards unmet need and this should be presented as a component of the overall housing requirement, rather than the current imprecise and unplanned approach which is very likely to lead to the significant unmet needs not being met.

- 2.11 As a result of the above, additional housing allocations are needed to ensure minimum housing requirement is met in accordance with paragraphs 11b, 35a and 61 of the Framework.

## Housing Requirement

**Q67. Is a minimum housing requirement of 19,620 justified and consistent with national policy? What is the status of the 996 dwellings referenced within the table in Policy DPH1 as total under/over supply for resilience and unmet need? Should this figure be included within the annual housing requirement for the district?**

**Q68. Are there other considerations that are likely to drive an increase in the homes needed locally, such as any needs that cannot be met within neighbouring areas namely the 30,000 dwellings of unmet need identified up to 2050 in the Coastal West Sussex and Greater Brighton authorities, Housing Need and Requirement Topic Paper (HN RTP) (H5), and the more immediate housing needs of Crawley, Brighton and Horsham?**

- 2.12 A total of 19,620 is an insufficient number of homes to be planning for in a district with few constraints and scope for additional growth particularly in and around its three main settlements (East Grinstead, Haywards Heath and Burgess Hill).
- 2.13 As referred to above, the over supply of 996 units (55 units per year) is woefully inadequate to account for both non- or delayed implementation (which is likely to occur given the reliance on strategic allocations) and to contribute to significant unmet housing needs identified across the Northern West Sussex HMA (as a result of the restrictions on delivery imposed by water neutrality matters in Horsham and



- other growth constraints faced by Crawley), and the severe and historic unmet needs of the Brighton and East Sussex HMA (particularly from Brighton and Lewes).
- 2.14 In the context of the severe under supply issues across the relevant HMAs (including a projected deficit of -8,947 across the Northern West Sussex HMA, and a projected deficit of housing across both the NWS and Brighton HMAs of -32,693), Mid Sussex must work to find innovative and aspirational solutions to addressing the wider housing needs, and must working positively to explore ways to boost its supply of housing by allocating additional sites in sustainable locations such as the three towns identified as Category 1 settlements.
- 2.15 A failure to properly plan (or at least test for alternative development scenarios) to address unmet needs from neighbouring authorities will lead to a plan that is not sound as it will not have been prepared positively or effectively. This is apparent in the Submission Plan whereby the allocation for resilience/unmet needs of 996 units is not only inadequate but is also not included in the Council’s housing requirement figure set out in policy DPH1 which raises questions over the certainty of this provision.

**Q69. If so, are there any policies within the Framework that protect areas or assets of particular importance that provide a strong reason for restricting the overall scale, type or distribution of housing, within the plan area; or would any adverse impacts of meeting the Council’s OAN and the unmet needs of others significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework as a whole?**

- 2.16 The current water neutrality constraint (a HRA matter) faced by authorities in the south-east (particularly Horsham and Crawley districts) means that development in these areas is projected to be restricted at least in the short term, until an authority-led offsetting solution (SNOWS) is in place; and is likely to be constrained further until a more permanent strategic solution to the matter is found.
- 2.17 Whilst water neutrality does affect a very small proportion of the western boundary of the Mid Sussex District, the district largely falls outside the Sussex North Water Supply Zone and those areas are completely unaffected by the requirement to demonstrate water neutrality. The restrictions on development resulting from water neutrality in Horsham and Crawley are projected to lead to a significant and





unprecedented under supply of housing in these areas, and across the Northern West Sussex HMA as a whole, which is a matter that is universally agreed in the relevant Statement of Common Ground.

- 2.18 It is acknowledged that the district comprises areas designated as National Landscape (High Weald) to the north, and National Park (South Downs) to the south. Notwithstanding this, the remaining areas of the district are largely free of designations / protected areas and therefore have no strong reason for development to be restricted. Furthermore, the district is relatively sustainable and accessible, particularly around its highest tier settlements, like Haywards Heath. As such, in the context of significant undersupply across the wider HMA, the benefits of seeking to boost the supply of housing in the unrestricted areas of the district is likely to be far outweighed by any adverse impact that may arise.

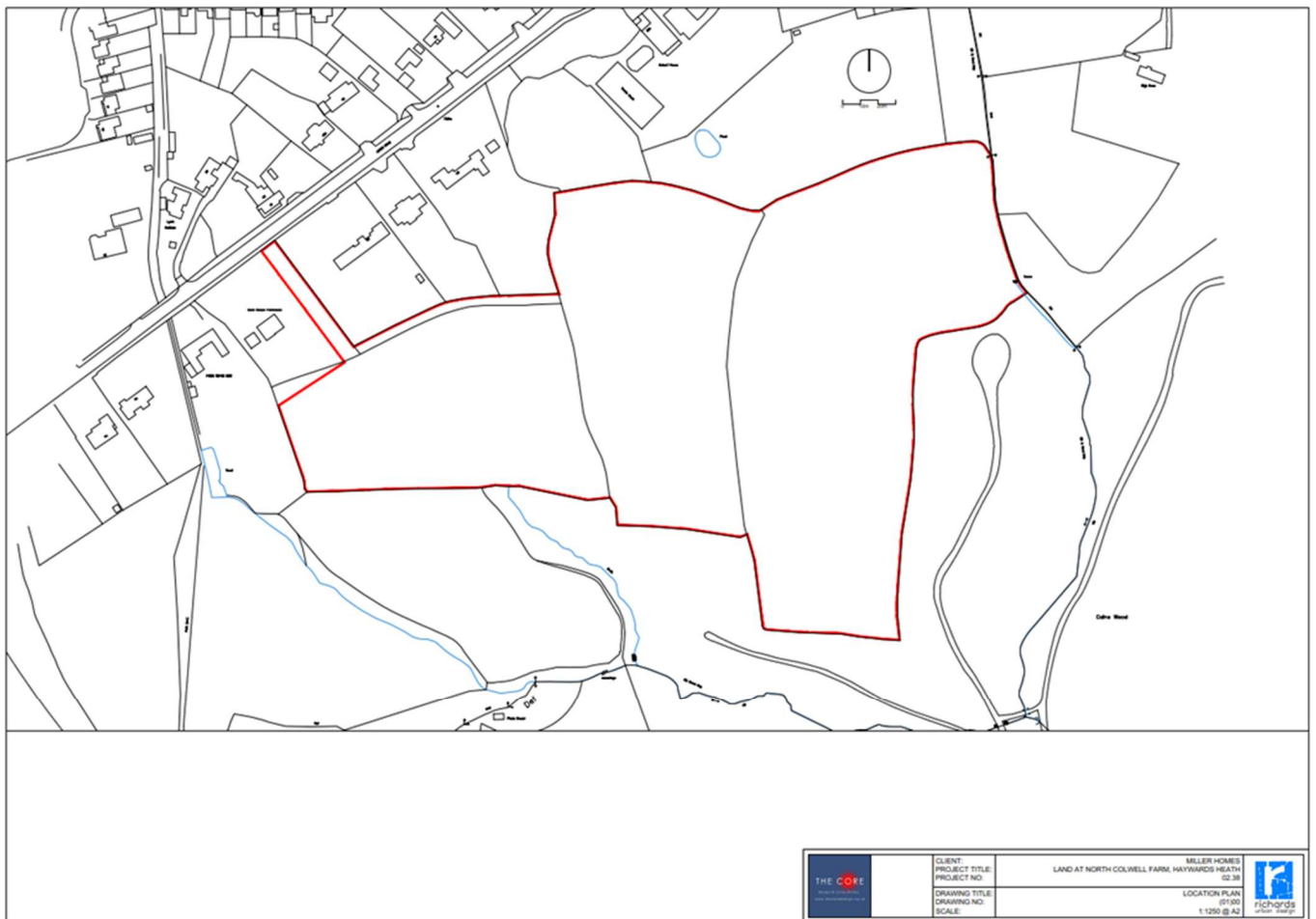
**Q72. Are any main modifications necessary for soundness, if so, why?**

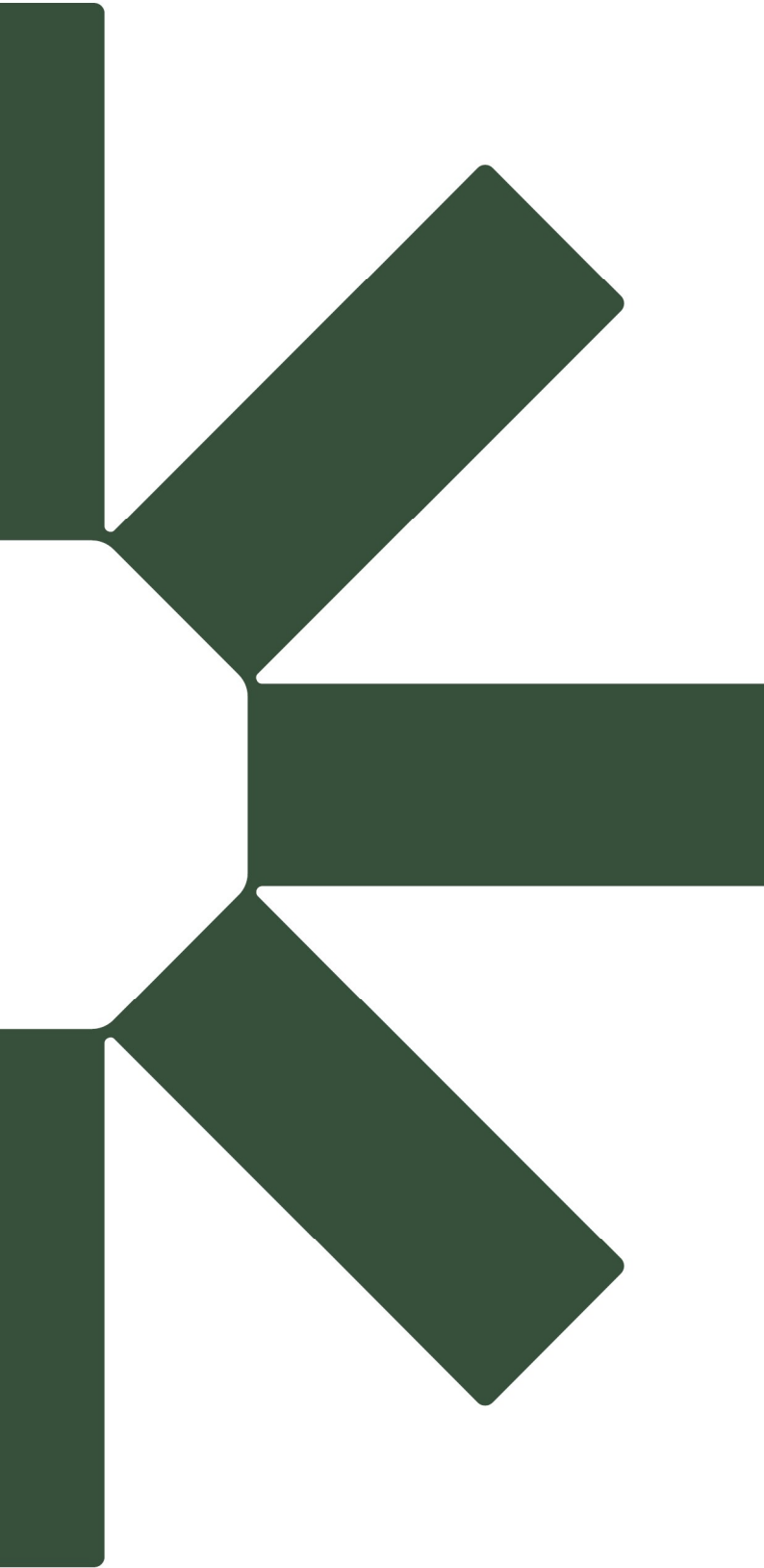
- 2.19 In order to make the plan sound, the plan period must be extended by one year to 2040 to meet the minimum 15-year requirement of paragraph 22 of the Framework.
- 2.20 An additional location-specific affordability uplift to the Local Plan housing target should be applied to account for severe affordability challenges in Mid Sussex.
- 2.21 A buffer of at least 10% should be applied to the housing target to properly account for resilience (non-implementation).
- 2.22 MSDC also need to include a separate housing figure, as a component of the overall housing requirement, to meet unmet housing needs, separate from the housing buffer. Failure to do so means the significant unmet needs in the district will remain unmet. It also underlines a failure to comply with the Duty to Co-operate (see Matter 2 Statement).
- 2.23 To account for the raised housing target resulting from the above changes, additional housing allocations will be needed, located in and around the unconstrained higher tier settlements like Haywards Heath in order to ensure development comes forward without delay and in accordance with the settlement hierarchy.



# Appendix A Colwell Farm, Haywards Heath: Site Location Plan

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