

## **6. UPDATE ON PREPARATION OF THE SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT**

REPORT OF: DIVISIONAL LEADER FOR PLANNING AND ECONOMY  
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Wards Affected: All  
Key Decision: Yes  
Report to: Scrutiny Committee for Communities, Housing and Planning  
Date of meeting: 4<sup>th</sup> July 2018

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### **Purpose of Report**

1. The purpose of this report is to update the Committee on work which has been undertaken since January 2018, to inform the preparation of the Site Allocations Development Plan Document (DPD).
2. The Committee is asked to note the proposed change to the timetable for the preparation of the Site Allocations DPD.
3. The report sets out further technical work which will need to be carried out by officers and appointed consultants to assess deliverability and to discuss opportunities and constraints on sites, to inform the preparation of the Site Allocations DPD.

### **Summary**

4. This report:
  - a) Informs the Committee of a minor revision to the timetable for preparation of the Site Allocations DPD;
  - b) Provides an update on the preparation and publication of the Strategic Housing and Economic Land Availability Assessment (SHELAA) and the further assessment of housing and employment sites;
  - c) Identifies technical work which has recently been commissioned to support the preparation of the Site Allocations DPD;
  - d) Describes consultation which has taken place with other Local Planning Authorities under the Duty to Cooperate and briefings for parish and town councils; and
  - e) Explains the next steps officers will take to contact and liaise with developers and landowners to enable a full assessment of the deliverability of the sites to be carried out.

### **Recommendations**

5. **That the Scrutiny Committee for Communities, Housing and Planning:**
  - i. **Notes the contents of this report; and**
  - ii. **Notes the extent of work required to assess sites and implications of this on the timeline originally proposed for the preparation of the Site Allocations DPD.**

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## Background

6. At the District Plan Examination, the Council committed to preparing a Site Allocations DPD, which will allocate sites to provide the residual housing requirement for approximately 2,500 homes, to meet the Council's full housing need over the Plan period to 2031.
7. The Strategic Housing and Economic Land Availability Assessment (SHELAA) and the Site Selection report will be used to inform the Council's consideration of the sites nominated for development.
8. In January 2018, this Scrutiny Committee considered the proposed process for assessing sites through the SHELAA, and the Site Selection Report. Appendix 1 sets out the process which was agreed by the Committee. A Member working group was set up to oversee this work. The working group has met on 6 occasions. The sections of the table shaded pale green reflect those tasks which have been completed to date.
9. This report also provides information on the work required to inform the preparation of the Site Allocations DPD.

## Site Allocations DPD – update to timetable

10. The Council's Local Development Scheme (LDS) sets out the timetable for preparation of development plan documents. It also provides information on the timetable for preparation of other supporting documents. The LDS needs to be kept up to date. A Cabinet resolution on 16<sup>th</sup> October 2017 brought into effect the latest revision which covers the period from 2017 to 2020. It anticipates that a Regulation 18 Issues and Options consultation (the first round of formal public consultation) on the draft Site Allocations DPD will be published in Autumn 2018, and that a Regulation 19 consultation will take place between Autumn 2019, with adoption of the Plan anticipated in July 2020.
13. The reason there is a delay in carrying out the two consultations is because of the volume of work required to assess the sites and to consider the outcome of the consultation. There are a total of 238 housing sites providing 31,000 units of housing, and 82 employment sites in the SHELAA. All of these sites need to be assessed. This work will take time given the large number of sites.
14. Officers have recently commissioned consultants to prepare a transport model to support the preparation of the Site Allocations DPD. Due to the complexities of this piece of work and the availability of consultants, the appointment of consultants took a number of months longer than was originally anticipated. This has impacted on the timeline for the preparation of the DPD.
15. The outputs of the transport modelling work will be used to carry out air quality modelling, which will then inform the Habitats Regulations Assessment of the Site Allocations DPD. It has become clear that this series of assessments, which needs to take place sequentially, will take until the end of 2018 to complete.
16. The results of the Habitats Regulations Assessment will inform the selection of sites and the Issues and Options consultation document. Therefore it is recommended that the Issues and Options consultation is deferred until Summer 2019, to allow for further work on options if required, informed by the outcomes of the technical work.

17. As a consequence the Regulation 19 consultation is likely to be delayed, to early 2020, with submission of the Plan for Examination anticipated in Spring 2020. It is anticipated that the Plan will be adopted in late 2020, a slippage of five months from the date set out in the LDS 2017. This minor delay will not impact on the overall timeline agreed in the Examination for the District Plan. This timetable will be kept under review and if required, the need to review the LDS will be reconsidered in due course.

## **Strategic Housing and Economic Land Availability Assessment – Progress update**

### SHELAA - Stage 1

18. A Call for Sites was held between October 2017 and February 2018. The Council operates a 'rolling' Call for Sites, but in order to ensure that sites were included in the April 2018 SHELAA, nominations were received up to February 2018. AA.
19. A proforma has been prepared for each of the housing and employment sites, which include a map of the site, a high level assessment of the site's suitability, availability and achievability and an indicative timescale of delivery. The proforma also includes a review of the planning history of each site. Information in the proforma's is based on a desktop assessment and a visit to each site.
20. All sites nominated to the Council through the Call for Sites have been included in the SHELAA except those which do not meet the criteria because they are below the size threshold (minimum size 0.25ha or capacity of 5 units for housing sites; 500 sq m employment floorspace). Seven sites were excluded on this basis.

### Publication of the SHELAA

21. The SHELAA was published on the Council's website in April 2018 ([www.midsussex.gov.uk/SHELAA](http://www.midsussex.gov.uk/SHELAA)). It is important to note that the SHELAA is a 'palette of sites' which does not allocate land, or pre-empt or prejudice any decision the Council makes in future on any particular site or settlement. The sites do not have any planning status.
22. The published documents include the SHELAA methodology, a completed proforma and map for each housing and employment site, and maps showing the locations of the sites by settlement.

### Evidence base and technical work

23. Three key pieces of technical work have been commissioned to support the preparation of the Site Allocations DPD. Consultants have been commissioned to build a transport model for the District, which will model the cumulative impact of all the planned growth in Mid Sussex and in neighbouring authorities. The model will test the implications on the highway network, and will predict the number and spatial distribution of trips which will be generated by planned growth.
24. Consultants have also recently been commissioned to carry out air quality modelling work to test the impact of planned growth on air quality, specifically in relation to the Air Quality Management Area at Stonepound Crossroads in Hassocks, and to the Ashdown Forest Special Area of Conservation. The results of the air quality assessment work will inform the Habitats Regulations Assessment work.

25. The Habitats Regulations Assessment consultants have also recently been appointed. A joint inception meeting has recently taken place, to ensure that the work carried out by all three consultants fits together to provide a cohesive picture.

### Consultation

26. In accordance with the Duty to Cooperate, officers have met officers from Tandridge District Council to discuss their plans for a Garden Village, and to discuss cross boundary highway impacts associated with this development, and with other planned development in both Districts.
27. Meetings have also been held with officers from Reigate and Banstead District Council to discuss their proposed allocation of a large employment site near Gatwick Airport, and the implications on the highway network, employment patterns and environmental impacts.
28. Officers have also worked with the other local authorities affected by the Ashdown Forest to sign a Statement of Common Ground, and to continue to share good practice and to liaise with Natural England.
29. Parish and Town Councils have been briefed on the preparation of the Site Allocations DPD. Further meetings with the Town and Parish Councils are planned in the coming months.

### Next Steps

30. Officers will work with service providers to ensure that infrastructure can be provided alongside sites identified as having development potential. Statements of Common Ground will be sought with all interested parties. Officers will continue to meet with neighbouring authorities, as required by the Duty to Cooperate.
31. National Planning Practice Guidance requires that a site's availability should be based on the best information available, confirmed by information from land owners. Where constraints are identified, the assessment should consider what action would be needed to remove them. The guidance also notes that the advice of developers and local agents will be important in assessing lead in times and build out rates.
32. In order to properly obtain and assess all of the above information, officers will contact and liaise with developers over the coming months..
33. Developers have also already begun to contact Ward Members and parish councils, lobbying them to consider sites for inclusion in the Site Allocations DPD. It is recommended that, if Members are contacted in this way, they refer the developer to the BUL for Planning Policy, who will liaise with the developers.
34. The SHELAA provides the long list of potential sites, which are then subject to the further work set out in Appendix 1, stage 2, such as consideration against the District Plan strategy and further assessment of constraints and opportunities of sites. The Member Working Group will consider the outcomes of this further work and will identify a shorter list of sites, which will then be subject to testing through the transport model and HRA ahead of the issues and options consultation.

### **Financial Implications**

35. Commissioning of consultants to carry out transport modelling, air quality assessment and Habitats Regulations Assessment has financial implications and these have been budgeted for.

### **Risk Management Implications**

36. If a robust and detailed assessment of the sites is not undertaken, the inclusion or exclusion of sites from the Sites Allocations DPD will be challenged at the DPD examination and risk it not being adopted in a timely manner. The Site Allocations DPD will identify housing and employment sites which will enable the Council to demonstrate a five year housing land supply; without this document in place, the Council will be vulnerable to speculative planning applications.

### **Equality and Customer Service Implications**

37. It is important that the Council allocates sites for housing and employment to maximise accessibility for all to decent housing and employment opportunities. An Equality Impact Assessment will be prepared alongside the Site Allocations DPD to ensure opportunities to promote equality and/or barriers to service are considered and addressed.

### **Other Material Implications**

38. There are no other material implications.

**Appendix 1:** Strategic Housing and Economic Land Availability Assessment – methodology  
[www.midsussex.gov.uk/shelaa](http://www.midsussex.gov.uk/shelaa)

**Appendix 1 - Strategic Housing and Economic Land Availability Assessment  
Phase I - SHLAA**

Site Survey stage			
	Task	Comment	Output
Stage 1	Undertake call for sites	Ended 30 <sup>th</sup> October 2017	
	Review existing sites in SHLAA	In particular sites which can accommodate 5 or more residential units, or employment sites which are 0.25 hectares or larger, or could accommodate 500sqm of employment floorspace.	
	Review other sources of site data	Review of planning history, previous SHLAA submissions, or pre-application discussions.	
	Update database to include new sites	Undertake site visits	
	Review sites and broad areas not promoted	NPPG requires LPA <i>'to actively identify sites through the desktop review and not simply rely on sites that have been informed about'</i> . The Council will also consider whether any broad areas which have not been nominated for development may be suitable.	
			Long list of sites – to be taken for further consideration
			Additional list which identifies sites too small for inclusion
Site Assessment			
Stage 2	Review BUA boundaries	Decisions to make on some sites, may show additional sites	
	Assess against absolute constraints	For housing and employment, sites wholly within SAC, SSSI, or a Scheduled monument. For housing sites, wholly within flood Zone 3b (the functional flood plain).	A short further list of rejected sites.
	Estimate density/site capacity	Using thresholds in Density topic paper and most up to date information on densities. Based on initial desk based study of developable area. Estimate of employment capacity.	
	Assess suitability based on key constraints	Consideration of types of development, guided by the development plan and market and industry requirements in the	

		housing market or functional economic area. Also consideration of physical limitations, potential impacts on landscape, nature and heritage conservation, likely market attractiveness and environmental/amenity impacts.	
	Assess availability based on key constraints	Evidence of promotion. Issues of multiple ownership, ransom strips or operational requirements of landowners.	
	Assess achievability	Council's initial desk top high level viability assessment, taking into account constraints. Requires a density assumption, based on the assessment set out above. The viability information will inform development potential of the site.	
	Timescale	Delivery (when site can come forward)	
	Maps of sites	Both included and rejected	Maps
			Production of SHELAA – includes a pro-forma for each site assessed.

## Phase II - Site Selection Report

Confirming the Spatial Strategy			
	Review District Plan strategy, Neighbourhood Plan policies.  For sites on the boundary of the District, a desk top study of relevant policies in neighbouring authorities will be undertaken.	Settlement Hierarchy Settlement patterns Residual number	
Detailed assessment of Constraints and Opportunities			
	Task	Comment	Output
	Further desk-top assessment of site opportunities and constraints, and mitigation measures.	Flooding Landscape Heritage Biodiversity Employment Accessibility Transport Pollution/contamination Relationship to built up area/adjacent settlements Impact on coalescence	

		Capacity to provide infrastructure AONB	
			SHELAA proformas with commentary
Detailed evidence testing, informal consultation of shortlisted sites			
	Early Engagement with Stakeholders (to identify potential opportunities and constraints)	Statutory consultees WSCC Public Transport NHS Police Utility and Service providers Other MSDC consultees	May identify a further constraint/ opportunity on site.
	Sustainability Appraisal	To inform site selection	May identify a further constraint/ opportunity on site.
	HRA		
	Transport Study		
	Landscape Capacity		
	Availability		
	Achievability/viability		
	SFRA		Site selection document will identify palette of potential sites for inclusion in the Issues and Options consultation paper