

## 5. SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT – ASSESSMENT OF HOUSING SITES AGAINST DISTRICT PLAN STRATEGY

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: 25<sup>th</sup> September 2018

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### Purpose of Report

1. The Council is currently preparing a Site Allocations Development Plan Document (DPD). To inform the preparation of the Site Allocations DPD, an assessment of the 'palette' of housing sites against the District Plan Strategy has been undertaken. The purpose of this report is to provide an opportunity for the Committee to consider this assessment, which forms the first stage of the Site Selection process. The outcomes of the assessment are set out in Site Selection Paper One, and are appended to this report.

### Summary

2. This report:
  - a) 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;
  - b) Outlines the work carried out to assess the 'palette' of housing sites against the District Plan Strategy; and
  - c) Outlines the ongoing work programme.

### Recommendations

3. **That the Scrutiny Committee for Communities, Housing and Planning:**
    - i. **Consider and comments on the work to date and;**
    - ii. **Notes the further work to be undertaken on the residual housing and employment sites.**
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### Background

4. At the District Plan Examination, the Council committed to preparing a Site Allocations Development Plan Document, which will allocate sites to provide the residual housing requirement of approximately 2,500 homes (identified in DP4:Housing), to meet the Council's full housing need over the Plan period to 2031.

5. At its meeting in January 2017, this Scrutiny Committee considered the draft SHELAA and Site Selection Methodology. A Member working group was set up to oversee this work.

#### **SHELAA – additional sites**

6. The publication of the SHELAA was the first stage in the preparation of the Site Allocations Document. The first version of the SHELAA was published in April 2018. Members will recall that the ‘call for sites’ for inclusion in the SHELAA is always open. During the process, officers have become aware of further sites. This has resulted in an additional housing site and 22 employment sites being added to the SHELAA since April. Any site submissions received after 31st July 2018 will not be added to the SHELAA at this time. This is to enable officers to work to a final list when undertaking more detailed site assessment work. The next opportunity for additional sites to be promoted will be during the Issues and Options Consultation in summer 2019.

#### **Implications of revised National Planning Policy Framework (NPPF)**

7. The updated SHELAA and Site Selection Methodologies were published ahead of the revised NPPF (July 2018). The NPPF requires policy-making authorities to prepare housing land availability assessments (paragraph 67). The detailed guidance for the preparation of land availability assessments is set out in the Planning Practice Guidance.
8. An assessment of the revised NPPF has been made to identify any potential implications on the SHELAA and Site Selection Methodologies. In terms of constraints, the only change which has the potential to impact on the site selection process is the additional protection that NPPF 2018 provides to Ancient Woodland, which identifies in footnote 6 that Ancient Woodland is an irreplaceable habitat in relation to plan making. There are 10 sites within the remaining sites that are impacted by the presence of Ancient Woodland to some extent. However, in all but one of these sites, Ancient Woodland is only present on part of these sites, and therefore it is considered that they should not be excluded and they should continue to be included for consideration in the site selection process.

#### **Assessment of Sites against District Plan Strategy**

9. The methodology for the site selection process was subject to consultation with a range of stakeholders including developers, adjacent local authorities and Town and Parish Councils. Members of this Committee considered the responses made and the subsequent amendments to the methodology.
10. The Member working group has met nine times to consider the work of the officers in their initial assessment of the housing and employment sites.
11. The first stage in the site selection process is the assessment of housing sites when the District Plan Strategy is applied. This assessment includes consideration of settlement hierarchy, settlement patterns and the residual housing requirement. The findings of the assessment are appended to this report and will be published as the ‘Site Selection Paper One – Assessment of Housing Sites against District Plan Strategy’. Further Site Selection Papers will be prepared throughout the site selection process, and will be presented to this Committee.

12. Employment sites are not considered in Site Selection Paper one, as the District Plan does not set a spatial distribution for the provision of employment sites. Employment sites will be considered in a future site selection paper and presented to this Committee at a later date.
13. The development strategy for the Site Allocations DPD has been established through its 'Parent' document, the adopted Mid Sussex District Plan. The starting point for the site selection process of the Site Allocations DPD is the delivery of the District Plan strategy, which has been confirmed as a sound approach.
14. The District Plan provides the development framework for the growth in Mid Sussex up to 2031. The Plan sets a housing requirement, a target for the creation of new jobs, strategic allocations and development management policies.
15. Policy DP4: Housing, states that there is a minimum housing requirement of 16,390 dwellings. The Plan states that this requirement will be delivered through existing commitments of 7,091 dwellings. Further allocations include two strategic sites, North and north-west of Burgess Hill (3,500 dwellings) and Land north of Clayton Mills, Hassocks (500). Once a windfall allowance and existing completions has been taken into account, the residual amount to be allocated is 2,439 dwellings. It is this residual amount that the District Council is seeking to identify through the preparation of the Site Allocations DPD.
16. Policy DP4: also sets out the Spatial Distribution of Housing Requirement, which is as follows:

<b>Settlement Category</b>	<b>Settlements</b>	<b>Minimum Requirement over Plan Period</b>	<b>Minimum Residual from 2017 onwards (accounting for completions and commitments)</b>
1	<b>Burgess Hill, East Grinstead, Haywards Heath</b>	<b>10,653</b>	<b>1,272</b>
2	<b>Copthorne, Crawley Down, Cuckfield, Hassocks and Keymer, Hurstpierpoint and Lindfield</b>	<b>3,005</b>	<b>838</b>
3	<b>Albourne, Ardingly, Ashurst Wood, Balcombe, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne, Turners Hill and West Hoathly</b>	<b>2,200</b>	<b>311</b>
4	<b>Ansty, Staplefield, Slaugham, Twineham and Warninglid</b>	<b>82</b>	<b>19</b>
5	<b>Hamlets such as Birch Grove, Brook Street, Hickstead, Highbrook and Walstead</b>	<b>N/A</b>	<b>N/A</b>
	<b>Windfall</b>	<b>450</b>	
<b>Total</b>		<b>16,390</b>	<b>2,439</b>

17. The objective of the District Plan is to deliver sustainable development, which supports economic, infrastructure and social needs, whilst maintaining the settlement pattern and protecting the quality of the rural and landscape character of the District. Sites that are unrelated to existing settlements, and therefore are isolated sites within the countryside do not fit with the strategy. This is because spatial distribution of the

housing requirement focuses development at existing settlements, based on settlement categories.

18. An assessment of whether a site conforms to the spatial strategy has been based on two criteria. If a site fails either one of these, it has been assessed as not being compliant with the District Plan strategy. The criteria are:
  - Connectivity with existing settlements – The criteria established to assess the degree of separation is based on a distance of 150m from the built up area boundary (as defined on the Policies Maps). 150m represents a distance that the Council considers differentiates between being connected or remote from existing settlements. This has been based on desktop and site assessments. However, there are a small minority of sites within 150m of the built up area which have been assessed as clearly detached from the settlement due to their access or constraints (such as ancient woodland) separating the site from the settlement
  - Size of the site in relation to the existing settlement hierarchy and indicative housing requirements for individual settlements. This criteria is set out in the supporting text to DP6. Whilst the Plan sets out a minimum residual requirement, the Site Allocations DPD should broadly follow the levels of growth set out in DP4. Therefore sites that deliver levels of growth, significantly beyond that required by the District Plan strategy, are not considered to be compliant with the strategy. DP4 states that a District Plan review will begin in 2021 with submission to the Secretary of State in 2023. It will be for this review to address any changes to the overall housing requirement (following a review of this figure based on the new Standard Method outlined in the NPPF), including unmet needs from neighbouring authorities. This review will also be an opportunity to re-promote sites that do not conform to the current District Plan 2014-2031 strategy and policies.
19. A list of the sites that have been assessed as not being compliant with the District Plan Strategy are set out in the Site Selection Paper in Appendix 1. Of the total of 236 housing sites, 91 do not meet the spatial strategy and therefore will not be subject to further consideration at this stage in the preparation of the Site Allocations DPD. Following the detailed review of the remaining sites, if it becomes clear that the residual target cannot be met these sites may have to be reviewed.

### Next Steps

20. As set out above, the methodology for the Site Selection process has been considered and supported by Members and other interested parties. This methodology will be developed further to include site selection criteria which will be used to make decisions as to which sites should be included in the Site Allocation DPD. Further selection criteria will be published in Site Selection Paper 2, following engagement with the Members Working Group and Developer Liaison Group.
21. Officers will continue to work with the consultants appointed to undertake the Transport Assessment, Air Quality and Habitats Regulations Assessment Work.

### **Financial Implications**

22. Commissioning 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**

23. 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. The allocation of additional employment sites will make an important contribution to the delivery of Economic Development Strategy.

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

24. 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**

25. There are no other material implications.

Appendix 1: **Site Selection Paper One – Assessment of Housing Sites against District Plan Strategy**